



PUBLIC DISCLOSURE

March 2, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

JPMorgan Chase Bank, N.A.
Charter Number: Charter #8

1111 Polaris Parkway
Columbus, OH 43240

Office of the Comptroller of the Currency

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

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

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Overall Community Reinvestment Act (CRA) Rating

Institution's CRA Rating: This institution is rated Satisfactory

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

Performance Levels	JPMorgan Chase, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

Lending Test

- Chase's overall lending performance is rated High Satisfactory based on good lending performance in 17 of the 30 rated areas, which included two of the bank's most significant markets. Lending performance was excellent in 10 rated areas and adequate in the three remaining rated areas.
- The bank achieved excellent or good distribution of loans to borrowers and small businesses of different income levels in all 30 rating areas. Distribution of loans to borrowers in different geographies was excellent or good in 18 of the bank's rating areas, including a majority of the markets where the bank has the most significant presence.
- Chase's lending levels reflect excellent responsiveness to the credit needs in the majority of assessment areas (AAs). In a majority of AAs, the bank's lending market share, as measured by its ranking or percentage, exceeds its ranking or percentage market share of deposits.
- The institution is a leader in making community development (CD) loans. Chase's volume and nature of CD lending has a significantly positive influence on the Lending Test performance. CD lending has a significantly positive influence on 12 of the 30 rating areas and a positive influence on 7 of the 30 rating areas.
- The institution makes significant use of innovative and/or flexible loan products to meet the AA's credit needs.

Investment Test

- Chase's overall investment performance is rated High Satisfactory based on excellent investment performance in 21 of the 30 rated areas. Investment performance was good in the 8 of the 30 rated areas.

Service Test

- Chase's overall service performance is rated High Satisfactory based on excellent service performance in 14 of the 30 rated areas and good service in 13 of the 30 rated areas.
- Retail delivery systems are readily accessible in a majority of the rating areas.
- In a majority of the rating areas, Chase provides banking services through a number of alternative delivery systems (ADS), including full-service deposit-taking ATMs, mobile banking, telephone banking, and online banking.
- In 21 of 30 rating areas including the largest rating areas, the bank is a leader in providing CD services. In the other rating areas, CD services are good or adequate.

Description of Institution

JPMorgan Chase Bank, N.A. is a national bank with its main office in Columbus, Ohio, and headquarters in New York City. Chase is a multistate financial institution and the lead banking subsidiary of JPMorgan Chase & Co. (JPMCC), a global financial holding company also headquartered in New York City. JPMCC has bank and non-bank subsidiaries in investment banking, financial services for consumers, small business, commercial banking, financial transaction processing, asset management, and private equity products and services. On December 31, 2019, JPMCC held \$2.7 trillion in total assets and domestic deposits of \$1.4 trillion. JPMCC provides global financial services to millions of consumers and businesses in the United States (U.S.) as well as prominent corporate, institutional and government clients in 60 countries globally under the JPMorgan and Chase brands.

Chase is a full-service, interstate commercial bank with over \$2.4 trillion in total assets as of December 31, 2019. The bank provides a full suite of consumer and commercial banking services in 38 states and Washington, DC through a branch network of 4,975 branches and 16,475 automated teller machines (ATMs). All 16,475 ATMs are deposit-taking and offer a full range of services, including but not limited to: (i) cash withdrawals from a checking or savings account; (ii) cash advances from a credit card; (iii) cash and check deposits; (iv) account transfers; (v) payments (e.g., Chase credit card); (vi) view account balances and transactions. The bank's lending products include commercial lending, small business loans, consumer loans, residential real estate loans, Small Business Administration (SBA) guaranteed loans and other specialized lending programs. Deposit products include business and personal checking, money market, savings, time deposit and individual retirement accounts. Chase retail products and services are also available through call centers and mobile or internet access on a 24-hour basis.

For this analysis, the bank's geographic footprint is the District of Columbia and 31 states including: Arizona, California, Colorado, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin. Recent geographic expansion of the branch network has been almost entirely comprised of *de novo* branching, with no material external mergers or acquisitions over the evaluation period. In May 2019, JPMorgan Chase Bank, N.A and Chase Bank USA, N.A. (Chase USA) merged, with JPMorgan Chase Bank, N.A. being the surviving bank. This was a consolidation of the bank's corporate structure and did not involve an external acquisition.

Chase entered seven AAs at the latter part of the current examination period which are therefore considered as performance context for these recent market entries. These seven AAs are summarized in the table below:

Assessment Area Name (OMB Naming)	Entry Date
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	9/4/2018
Philadelphia, PA MD	10/17/2018
Pittsfield, MA MSA	3/19/2019
Worcester, MA-CT MSA	3/20/2019
Springfield, MA MSA	3/20/2019
Cambridge-Newton-Framingham, MA MD	3/21/2019
Frederick-Gaithersburg-Rockville, MD	4/30/2019

In 2019, the bank's net loans comprised 40.6 percent of total assets. Domestic loans were distributed as follows: residential real estate 28 percent, commercial 15.9 percent, consumer (excluding credit card) 6.6 percent, commercial real estate 14 percent, credit card 17.4 percent, and other loans 18.1 percent. Total deposits at year-end 2019 were \$1.65 trillion, including \$296 billion held in foreign branches, or 17.9 percent of total deposits. Foreign deposits are not Federal Deposit Insurance Corporation (FDIC)-insured and are held in non-U.S. branches. The impact of foreign deposits on the bank's lending and investment capacity was considered in the analysis of community development (CD) loans and investments. On December 31, 2019, JPMCC held tier 1 capital of \$207 billion and adjusted tier 1 capital of \$170 billion.

JPMCC's principal nonbank subsidiary is J.P. Morgan Securities LLC, the domestic investment-banking firm. JPMCC and the bank have numerous other significant affiliates that deal with venture capital, asset management, insurance, and other financial services. JPMCC operates domestically and globally through subsidiaries, affiliates, joint ventures, representative offices, international branches, and subsidiary foreign banks.

Bank subsidiaries include trust operations, property management companies and leasing companies. The bank also operates through affiliates and joint ventures. Chase requested that the activities, loans, and services of certain affiliates, subsidiaries, and joint ventures be considered in this evaluation. Applicable loans originated by these parties within Chase AAs were included in the review. Chase also requested consideration for grants made by its affiliated JPMorgan Chase Foundation. Please see appendix A: Scope of Evaluation, for detail about affiliates, subsidiaries and joint ventures and their products reviewed for each entity.

Chase has no subsidiaries that negatively impacted the bank's capacity to lend or invest in its communities. Neither the bank nor any of its affiliates were constrained by legal or financial impediments that would hamper its ability to help meet the credit needs of its communities during the evaluation period.

Chase's business strategy is to provide an extensive range of financial services in the U.S. and globally. The organizational structure contains four business segments as well as a Corporate segment. The four business segments are categorized as follows: Consumer and Community Banking, Corporate and Investment Banking, Commercial Banking and Asset and Wealth Management.

Chase received a Satisfactory rating in its previous CRA evaluation, for the evaluation period of January 1, 2011, through December 31, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank’s CRA performance evaluation (PE) was evaluated using Large Institution CRA Examination Procedures. The evaluation covers the bank’s CRA-related activities from January 1, 2014, through December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities related to COVID-19 will be considered in the subsequent evaluation. The Office of the Comptroller of the Currency (OCC) considered Chase’s Home Mortgage Disclosure Act (HMDA)-reportable loans (home mortgage lending consisting of home purchase, home improvement and home refinance) and small business lending (including business credit cards), small farm lending, CD lending grants, donations, and other investments for CRA purposes. The OCC also considered any other loan data such as letters of credit used to support CD activities. Management did not request consideration for its consumer lending, which includes automobile loans and consumer credit cards; therefore, this lending is not presented herein.

The lending test evaluation period covers calendar years 2014-2019 and is based on the 2010 Census data changes beginning on January 1, 2012, as well as the Office of Management and Budget (OMB) Metropolitan Area (MA) geographic boundary changes beginning on January 1, 2014. Analysis of data related to calendar years 2014 to 2016 is based on 2010 Census data, 2013 OMB MA boundaries, 2014-2016 Federal Financial Institutions Examination Council (FFIEC) estimated median family income (MFI) for borrower analysis, and the 2010 American Community Survey (ACS) MFI (updated to reflect 2013 OMB MA boundaries for geographic analysis of CRA performance). For CRA purposes, the ACS replaced the decennial census. Analysis of data related to calendar years 2017-2019 is based on 2015 ACS data, 2013 OMB MA boundaries (2019 is evaluated separately from 2017-2018 if impacted by MA boundaries changes), 2017 FFIEC-estimated MFI for borrower analysis, and the 2015 ACS MFI for geographic analysis of CRA performance.

Since the lending test evaluation period is January 1, 2014, through December 31, 2019, there could be up to three separate analyses for an AA lending performance. The chart below shows when two analyses are required versus three.

Evaluation Period Years Breakdown	2010 Census/ACS Data, 2014-2016 FFIEC MFI, and 2010 ACS MFI	2015 ACS data, 2017 FFIEC MFI, and 2015 ACS MFI	
	2014-2016	2017-2018	2019
Impacted by 2013 OMB MA Boundaries Changes	Analysis 1	Analysis 2	Analysis 3
Not Impacted by 2013 OMB MA Boundaries Changes	Analysis 1	Analysis 2	

The investment test, service test, and CD investments and services evaluations, respectively, are combined for the calendar years 2014 through 2019.

The bank merged with Chase USA in May 2019. Chase USA received an Outstanding rating during its last PE dated December 31, 2014. Chase USA was one of the largest issuers of consumer and small business credit cards in the U.S. At the time of the merger, Chase USA had \$141 billion in total assets, \$54 billion in total deposits, and \$24 billion in tier 1 capital. All of Chase USA's assets, deposits, and capital were absorbed into Chase. Chase USA's AA was comprised of three counties, New Castle County, Delaware County, and Philadelphia County, within the Philadelphia-Camden-Wilmington, PA-NJ-DEMMSA. The current evaluation includes Chase USA's small loans to businesses, small loans to farms, and community development services for the years 2015 through May 2019.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA as Combined Statistical Areas (CSA) are evaluated as a single AA. Similarly, bank delineated non-metropolitan (Non-Metro) AAs within the same state are combined and are evaluated as a single AA. 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.

The states and CSAs comprise the 30 rating areas assessed in this evaluation: 22 states and eight CSAs. Performance in the limited-scope AAs was considered in developing state ratings. For states with AAs in Non-Metro areas, the analysis is based on the combined Non-Metro areas within each state. For analysis purposes, the OCC combined Non-Metro AAs within each state. From each rating area, the OCC selected one or more AAs for full-scope reviews. In states with multiple large AAs such as California and Texas, the OCC selected more than one AA for a full-scope review. Across all rating areas, the OCC selected 38 full-scope AAs. The OCC based these selections on several criteria, including the bank's deposits and loans and the AA's geographic size and population relative to the rating area. The OCC also selected smaller AAs that had not previously been reviewed as full-scope AAs during prior evaluations. All AAs consisted of whole geographies and met the requirements of the regulation. The AAs reasonably reflect the different trade areas that the bank's branches could service and did not arbitrarily exclude any low- and moderate-income (LMI) areas.

Refer to appendix A: Scope of Examination, for a list of full- and limited-scope AAs. For AAs comprised of contiguous MDs/MSAs that are part of a CSA, the bank's performance is presented at the CSA level. For each full-scope review, economic information is separately detailed for each MSA area within a CSA.

Ratings

The bank's overall rating is a blend of the state ratings, and CSA ratings. The PE is presented by CSA rated areas followed by each state in alphabetical order.

While the ratings, conclusions, and analyses are based on the bank's activities over a six-year evaluation period, this PE only includes narratives and supporting tables for the years 2017, 2018, and 2019, which is the period of activity of greatest significance to overall conclusions. Additional discussion is included in the narrative when OMB boundary changes significantly impacted the bank's performance context or where performance in the 2014-2016 period differs significantly from performance in 2017-2019.

CSA ratings are based on the one AA. State ratings are based on conclusions of the AA(s) reviewed using full-scope evaluation procedures; however, limited-scope AA ratings were also considered.

Limited-scope procedures focused primarily on quantitative data, with consideration of qualitative data generally limited to demographic and competitive factors. Performance in limited-scope AAs was considered as stronger than, weaker than, or consistent with overall performance in full-scope AAs within the rating area. Based on these conclusions, there was a positive, negative, or neutral impact on the state rating.

In rating areas where there was a significant difference in weighting, as explained later, it is noted under the Scope of the Evaluation section. The loan distribution analyses compared HMDA loans and loans to small businesses to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context as to the reasonableness of the bank's performance. All peer aggregate lending data used in the analysis is from 2014-2018. Aggregate lending data for 2019 was not available at the time this evaluation was completed.

The state of California, the New York-Newark, NY-NJ-CT-PA CSA (New York-Newark CSA), the state of Texas, the Chicago-Naperville, IL-IN-WI CSA and the state of Michigan represent the bank's most significant markets in terms of lending, deposits, and branch distribution and carried the greatest weight in our overall conclusions. The state of California accounts for 36.7 percent of bank's home mortgage, community development, small business, and small farm loans (by number of loans), 11.2 percent of total allocated deposits, 20 percent of the branch network, and 23.5 percent of total ATMs. The New York-Newark CSA rating area accounts for 14.7 percent of bank's home mortgage, community development, small business, and small farm loans, 42.1 percent of total allocated deposits, 17.4 percent of the branch network, and 19.8 percent of total ATMs. The state of Texas accounts for 8.8 percent of bank's home mortgage, community development, small business, and small farm loans, 18.3 percent of total allocated deposits, 10.9 percent of the branch network, and 24.2 percent of total ATMs. The Chicago-Naperville, IL-IN-WI CSA rating area accounts for 8.7 percent of bank's home mortgage, community development, small business, and small farm loans, 6.3 percent of total allocated deposits, 6.6 percent of the branch network, and 8.7 percent of total ATMs. The state of Michigan accounts for 2.3 percent of bank's home mortgage, community development, small business, and small farm loans, 3.2 percent of total allocated deposits, 4.2 percent of the branch network, and 3.0 percent of total ATMs. When these top five rating areas were combined, they contained 71.2 percent of bank's home mortgage, community development, small business, and small farm loans, 81.1 percent of the bank's total allocated deposits and 41.1 percent of the branch network during the evaluation period.

Under the Lending Test, the OCC considered the weighting of both the number and dollar volume of loans to determine the weighting of loan products. The number of small loans to business represented 70.0 percent of the total number of loans compared to home mortgages representing 29.1 percent of total loans. However, when comparing the dollar amount of loans, home mortgages represented 88.5 percent of the total dollar amount of loans versus the total dollar amount of small loans to business representing 11.5 percent of total loans; the results of both analyses yield similar conclusions. Therefore, the OCC weighted home mortgages and small loans to businesses products equally. The loan product weighting was calculated equally for each rating area, and those weights were applied to each AA within the rating area. Farm lending is not a strategic focus of the bank. Small loans to farms represented less than 1.0 percent of the loan volume within a substantial majority of rating areas (21 rating areas) and less than 2.5 in the remaining rating areas.

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

Description of Factors Considered Under Each Performance Test

General themes regarding the various impacts on CRA performance over the evaluation period were:

Lending Test

Due to the changes in census data during the evaluation period, the bank's Lending Test performance was evaluated separately for 2014-2016 and 2017-2019. When arriving at overall rating area conclusions, significant weight was placed on the bank's lending performance in 2017-2019 when performance in low- or moderate-income geographies was inconsistent during the 2014-2016 time period. Greater significance was placed on the moderate-income borrower performance due to the challenges limiting opportunities in lending to low-income persons. The bank's lending in all AAs was evaluated.

- Performance in low-income geographies between 2014 and 2016 was consistent with other periods.
- Inconsistent performance in moderate-income geographies between 2014 and 2016 did not impact overall excellent performance.
- Loan Products Evaluated -The OCC evaluated home mortgage, small loans to business, and small loans to farms in each AA. All home mortgage products were reviewed, and conclusions were reached in the aggregate. As indicated above, farm loans are not a strategic focus or primary product in any of the bank's AAs. Small farm data analysis indicated that farm lending did not significantly affect the conclusions or ratings in any of the bank's rating areas. Therefore, a discussion of farm loans is not included in the rating areas. However, the data used in the analysis is included in appendix D.
- Lending Activity -To assess the bank's lending activity in each AA, the OCC compared the bank's market share and rank of loans using peer loan data to its market share and rank in deposits using FDIC deposit market share data as of June 30, 2019. Deposit market share data includes deposit data for FDIC-insured institutions such as banks and savings and loan associations (depository financial institutions). Deposit market share data does not include credit unions.
- Home Mortgage Products - For the various loan products considered under the Lending Test, home mortgage loans were weighted equally to small loans to business in developing conclusion. Home mortgages accounts for 88.5 percent of the total dollar amount of total loan volume and 29.1 percent of total number of loans. All home mortgage products including home purchase, home improvement, and home refinance loans were reviewed with conclusions based on home mortgage loan aggregate data and consideration of performance context that is discussed in each applicable rating area section within the Lending Test.
- Home Mortgage Products -Loan Distribution Analysis -Throughout all rating areas, as data was available, equal emphasis was given to the geographic and borrower distribution components of the Lending Test. The analysis of the distribution of loans to geographies with different income levels was given greater consideration to the bank's performance in moderate-income geographies when there were a small number of owner-occupied housing units in the low-income geographies. For the analysis of the distribution of loans by income level of the borrower, consideration was given to the impact that income and poverty levels, housing costs, and homeownership opportunities has on low-

and moderate-income individuals and families. In these higher cost markets, it is difficult for many low- and moderate-income individuals and families to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to low- and moderate-income borrowers relative to the aggregate's performance rather than demographic data.

- Small Business Lending - Loan Distribution Analysis -The loan distribution analyses compared loans to small businesses to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context as to the reasonableness of the bank's performance. All peer aggregate lending data used in the analysis is from 2014-2018. Aggregate lending data for 2019 was not available and not used due to timing of evaluation.

The OCC compared the bank's lending performance against available demographic data and aggregate lender performance. Any relevant performance context information available was considered. Expectations for lending in low-income geographies were the same for lending in moderate-income geographies. Performance in moderate-income geographies were weighted more heavily if there was a small number of businesses in low-income geographies. More weight was given to the bank's lending performance relative to demographics and less weight to performance relative to aggregate lenders. In some cases, it was more appropriate to place more weight on performance relative to aggregate lenders such as when bank performance exceeded aggregate, but bank performance and aggregate are less than demographic data. In those cases, performance relative to aggregate lenders can be more reflective of market conditions such as loan demand and opportunities.

- CD Lending - CD lending based on volume, complexity, and responsiveness provided a significantly positive, positive, neutral, or negative effect to the rating area's Lending Test rating, as applicable. Lending programs were limited by various factors over the examination period, the most significant of which included tier 1 capital requirement increases and competition in the Low-Income Housing Tax Credit (LIHTC) market.
- Flexible and Innovative Lending Products - Chase offered flexible home mortgage and small business lending programs in order to serve AAs credit needs. Flexible lending programs included government insured Federal Housing Administration (FHA), Veterans Administration (VA), Home Affordable Refinance Program (HARP), United States Department of Agriculture (USDA), and SBA loans. During the evaluation period, the bank launched a new flexible lending program called DreaMaker. Since January 2014, the bank provided 288,246 flexible mortgage and small loans to businesses totaling \$54.6 billion to low- and moderate-income borrowers, small businesses, or in low- and moderate-income geographies.
- Other Loan Data -The OCC also considered, at the bank's option, letters of credit used to support CD lending activities. The letters of credit were given positive consideration under the Lending Test if they supported or addressed an identified community development need in the AA. Chase issued over 180 letters of credit or standby bond purchase agreements totaling nearly \$3.5 billion. This other loan data helped many financing deals to come to fruition to create over 13,000 units of affordable housing.

Investment Test

- Qualified Investments -The analysis considered the volume of qualified investments and grants made during the current evaluation period and qualified investments that were made prior to the current evaluation period, which were still outstanding and continued to benefit the bank's AA. Emphasis was placed on those investments that were particularly innovative, complex, or responsive to the needs of the AA. The amount of consideration given to the current and prior period investments is based on the responsiveness of the investments to the needs in the AAs.

The analysis compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the tier 1 capital allocated to the AAs to gain a common perspective regarding the volume of investment activity. The OCC compared the CD investment activity volume in each AA to the tier 1 capital allocated to the rating areas and AAs based on the percentage of bank total deposits therein.

- Complex and Innovative Investment Products - The bank makes extensive use of complex CD investments, often in a leadership role. Many investments are complex LIHTC, and New Markets Tax Credits (NMTC). The LIHTC provides a tax incentive to construct or rehabilitate affordable rental housing for low- and moderate-income households. Other investments are complex as they include the participations from federal and state governments, local housing agencies, and real estate developers. Complex investments also require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance with legal and tax requirements.

Service Test

- Distribution of Branch Delivery Systems/Openings and Closings -The OCC placed primary consideration on the distribution of the bank's branches and their accessibility to low- and moderate-income individuals and geographies. Impact to the AA from the opening and closing of branches was considered. During the evaluation period, the bank continued to execute their ongoing control processes when determining whether to close or consolidate its retail branches. The bank considered the following factors in the decision-making process: 1) branch redundancy or proximity to other Chase locations or ATMs, 2) real estate costs for branches with expiring leases, 3) customer behaviors in the market, including transaction migration to the bank's growing digital capabilities, and 4) results of a detailed analysis of LMI service levels in each assessment area. Chase includes several departments of the bank, including its CRA personnel, in discussions to assess and mitigate any negative impact of branch consolidations to LMI customers and communities.
- Alternative Delivery Systems -The systems were assessed to determine if they improved access to retail banking services where financial centers may be limited. The alternative delivery systems included the following delivery channels: full-service deposit-taking ATMs, mobile banking, telephone banking, online banking, and the bank's own Secure Banking retail deposit product. To determine the effect alternative delivery systems have on the bank's service delivery systems, the OCC compared the number of enrolled customers residing in low- and moderate-income geographies for mobile banking, telephone banking, online banking, and Secure Banking to the population residing in low- and moderate-income geographies. The OCC also compared the number of full-service deposit-taking ATMs in low- and moderate-income geographies to the population in low- and moderate-income geographies.
- Adjacent Branches - In full-scope AAs, the OCC considered if adjacent branches, in middle- and upper-income (MUI) geographies, provided accessibility to individuals in low- and moderate-

income geographies. The OCC analyzed adjacent branches that are located within one-half-mile of a low- and moderate-income geographies. OCC verified and confirmed that these branches held deposit accounts of, and mortgage loans to individuals in adjacent low- and moderate-income geographies. OCC also verified that there are no barriers or other impediments that would prevent a resident of the low- and moderate-income geography from obtaining full use of the bordering branch's banking services. The OCC determined if it had a neutral or positive impact on the distribution of branch delivery systems.

- Banking Hours -The OCC considered banking hours, products and services, and the level of community development services.
- CD Services -The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration of the analysis of CD services was the responsiveness to the needs of the AA.

Other Information

- Assessment Areas -All AAs consisted of whole geographies and met the requirements of the regulation.

For AAs comprised of contiguous MSAs that are part of a CSA, the analysis of the bank's performance was conducted at the MSA level. If there were no anomalies at the MSA level, the bank's performance is presented for AAs at the CSA level. For each full-scope review, economic information is separately detailed for each MSA area within a CSA AA.

- Lending Gap Analysis -Summary reports and maps were reviewed, and lending activity of home mortgage loans, small loans to business, and small loans to farms were analyzed over the evaluation period to identify any gaps in the geographic distribution of loans in all full-scope AAs.
- Bank-wide Activities -During the past six years, the bank has provided \$26 billion in CD loans and \$16 billion in CD investments across its aggregate AAs and broader regional areas. Most were provided for the specific purpose of affordable rental housing development.

Community Contacts

The OCC gathered contact information to assist in understanding the AAs community profile and learn about opportunities for bank participation in helping to meet local needs. The information was used to assist in the evaluation of the bank's performance in the various AAs. The OCC's Community Affairs Officers conducted or updated contact information in the full-scope AAs for this evaluation. The Officers held interviews with a variety of large community organizations including housing agencies, small business development centers, and social service and community action organizations. Other OCC personnel gathered information from community groups, local government representatives, realtors, and business leaders. The OCC reviewed and considered comments received from the public in assessing the bank's performance during the evaluation period. Community contact information for the most significant rating areas is summarized within each MMSA or State rating areas.

Community contact information indicates that urban and rural areas continue to have various affordable housing, CD, and economic development needs that are not being met. Contact information noted that the economy in the respective areas has stabilized and/or is improving. Although unemployment rates in

most areas have declined, they remain high in some of the AAs. Affordable housing was consistently noted by numerous community contacts as a credit need throughout the AAs. Community contacts involved with economic development indicated that flexible financing options for small loans to businesses are important to creating additional job growth in communities. Small loans to businesses were identified as a major factor in expanding employment opportunities in both urban and rural areas. Many contacts noted that small loans to businesses have faced limited access to credit in recent years due to tightened lending standards. Many contacts noted that demand for micro small loans to business is strong, but these loans are not generally available from banks. In addition, contacts identified needs for small dollar consumer loans, affordable mortgage loans, and flexible lending standards for small businesses.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AA. This analysis is performed at the bank, rather than the AA, level.

The bank originated and purchased 76 percent of its total loans inside the bank's AA during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of Assessment Areas – 2014 Through 2019										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		#	%	#	%	
Home Mortgage										
2014	237,195	65.2	126,458	34.8	363,653	74,490,762	74.8	25,151,879	25.2	99,642,641
2015	258,577	67.7	123,437	32.3	382,014	103,531,344	77.2	30,630,945	22.8	134,162,289
2016	248,577	73.3	90,576	26.7	339,153	109,225,926	81.9	24,073,310	18.1	133,299,236
2017	248,646	73.2	91,032	26.8	339,678	96,378,090	80.5	23,418,167	19.5	119,796,257
2018	263,589	81.1	61,597	18.9	325,186	90,968,688	85.2	15,805,661	14.8	106,774,349
2019	292,875	80.7	69,826	19.3	362,701	116,254,763	84.6	21,223,347	15.4	137,478,110
Subtotal	1,549,459	73.4	562,926	26.6	2,112,385	590,849,573	80.8	140,303,309	19.2	731,152,882
Small Business										
2014	456,942	75.2	150,430	24.8	607,372	10,177,419	83.3	2,036,831	16.7	12,214,250
2015	420,827	76.7	127,976	23.3	548,803	10,515,932	84.7	1,897,673	15.3	12,413,605
2016	497,795	76.1	156,388	23.9	654,183	11,914,809	84.9	2,115,845	15.1	14,030,654
2017	587,713	76.2	183,106	23.8	770,819	12,850,824	85.1	2,254,707	14.9	15,105,531
2018	836,424	76.4	258,205	23.6	1,094,629	14,769,381	83.2	2,975,773	16.8	17,745,154
2019	1,147,527	81.1	267,040	18.9	1,414,567	19,146,264	85.5	3,255,364	14.5	22,401,628
Subtotal	3,947,228	77.5	1,143,145	22.5	5,090,373	79,374,629	84.5	14,536,193	15.5	93,910,822

Small Farm										
2014	2,333	36.9	3,986	63.1	6,319	55,687	52.1	51,272	47.9	106,959
2015	1,990	42.4	2,701	57.6	4,691	57,905	56.6	44,389	43.4	102,294
2016	2,310	43.0	3,068	57.0	5,378	63,614	59.9	42,663	40.1	106,277
2017	4,813	45.2	5,838	54.8	10,651	80,846	57.2	60,387	42.8	141,233
2018	6,757	42.3	9,212	57.7	15,969	86,647	49.7	87,745	50.3	174,392
2019	9,669	43.8	12,416	56.2	22,085	122,216	47.9	133,190	52.1	255,406
Subtotal	27,872	42.8	37,221	57.2	65,093	466,915	52.7	419,646	47.3	886,561
Total	5,524,559	76.0	1,743,292	24.0	7,267,851	670,691,117	81.2	155,259,148	18.8	825,950,265

Source: Evaluation Period: 1/1/2014 - 12/31/2019 Bank Data

Due to rounding, totals may not equal 100.0

Chase and CUSA data included for SBSF; data for each year is based on bank's assessment area definitions as of 12/31 of that respective year

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 (HUD), and the Bureau of Consumer Financial Protection (CFPB), as applicable.

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

CFPB Enforcement Action: Real Estate Settlement Procedures Act Kickbacks (File No. 2015-CFPB-0001), effective January 22, 2015. Terminated January 22, 2020.

- The CFPB and the State of Maryland's Office of the Attorney General's Consumer Protection Division took action against the bank for an illegal marketing-services-kickback scheme they participated in with Genuine Title, now a defunct title company that went out of business in April 2014.
- From 2010 through 2013, Genuine Title offered loan officers valuable services to increase the amount of loan business generated. The CFPB found that at least six bank loan officers in three different branches in Maryland, Virginia, and New York were involved. These officers referred settlement business to Genuine Title on almost 200 loans. The CFPB also alleged that Chase did not have an adequate system in place to ensure that its loan officers were following the law.
- Civil Money Penalties Paid to the CFPB: \$500,000.
- Per the Consent Order approximately \$300,753 in redress was provided to injured consumers, including but not limited to refund of moneys, restitution, damages, or other monetary relief, and for any attendant expenses for the administration of any such redress.
- The bank has enhanced their compliance program, including policies and procedures addressing the prohibition of mortgage loan officers receiving kickbacks for a business referral specific to a real estate settlement service involving a federally related mortgage loan.

The OCC found evidence of a violation of Section 5 of the Federal Trade Commission (FTC) Act, 15 USC 45 – Prohibition of unfair or deceptive acts or practices in or affecting commerce (UDAP). The bank failed to remediate 477 borrowers who were affected by a loss mitigation processing error. Estimated reimbursement to affected borrowers is \$6,131,400. The bank corrected its processing system and enhanced its policies and procedures to ensure that the violation does not recur.

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

The CRA performance rating was not lowered as a result of these findings. The OCC considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has

taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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

Multistate Metropolitan Statistical Area Rating

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

CRA rating for the NY CSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- An excellent level of lending activity.
- An excellent geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- An adequate level of CD loans that has a neutral effect on the rating.
- The extensive use of flexible products, and issuance of letters of credit that positively affected the rating.
- An excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and community economic development needs.
- The occasional use of complex investments and investments that serve as catalysts for additional development.
- The significant level of broader statewide investments further supports the bank's Investment Test performance.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in NY CSA

The NY CSA represents the largest retail market for the bank in terms of deposits, branches, and lending. Chase had \$597.6 billion in deposits² in the NY CSA representing 42.1 percent of the bank's total deposits. As of December 31, 2019, the bank operated 861 branches and 3,256 deposit-taking ATMs within the rating area, representing 17.4 percent of total branches and 19.8 percent of total ATMs. The bank originated and purchased approximately \$102.5 billion in loans or 14.7 percent of total bank loan originations and purchases during the evaluation period in the NY CSA.

The local banking environment is highly competitive with 216 FDIC-insured institutions operating 6,042 branches. Chase ranked first in deposit market share with 30.3 percent. The next three banks by deposit market share are Bank of America, N.A. (8.0 percent), BNY Mellon (6.3 percent), and Citibank, N.A. (6.0 percent). In addition to FDIC-insured institutions, this area is served by several credit unions, mortgage lenders and brokers, and money service businesses.

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.

² Of the \$597.6 billion deposits in the NY CSA, \$293 billion are non-retail branch deposits. The non-retail branch deposits do not reflect traditional retail customer relationships, rather they are wholesale funds. These deposits do not reflect where any of Chase's customers are located, where they work, or where they conduct business and were deducted from the analysis.

Chase's AA in the NY CSA is comprised of geographies in New York, New Jersey, and Connecticut. Refer to appendix A for a complete list of counties included in the AA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the NY CSA. The NY CSA poses challenges to home mortgage lenders in the AA, including Chase. The NY CSA is a high cost housing area, limiting access to affordable homeownership among LMI borrowers. The median housing value in the CSA is \$444,639 while the National Association of Realtors (NAR) 4Q2019 median sales price of a single-family home is \$428,000. 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 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 \$44,686 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$161,198 mortgage with a payment of \$865 per month; a moderate-income borrower earning \$71,498 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$257,918 mortgage with a payment of \$1,385 per month.

The poverty level across the AA was considered in the 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 household poverty level was 10.8 percent. However, in low-income geographies, the household poverty level increases to 36 percent and in moderate-income geographies it increases to 20 percent. In MUI geographies, the combined poverty level is just 8 percent.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5,230	12.2	21.3	31.7	33.0	1.9
Population by Geography	22,384,263	12.6	21.7	30.6	34.8	0.2
Housing Units by Geography	8,813,831	11.8	20.9	30.8	36.4	0.1
Owner-Occupied Units by Geography	4,256,466	3.0	13.3	36.2	47.5	0.1
Occupied Rental Units by Geography	3,745,696	21.6	29.3	24.8	24.0	0.2
Vacant Units by Geography	811,669	12.8	21.9	29.9	35.3	0.2
Businesses by Geography	1,591,271	7.5	15.6	29.2	46.6	1.0
Farms by Geography	27,814	3.3	12.3	34.4	49.8	0.2
Family Distribution by Income Level	5,303,319	24.8	15.6	17.4	42.2	0.0
Household Distribution by Income Level	8,002,162	27.0	14.3	15.9	42.8	0.0
Median Family Income MSA - 10900 Allentown-Bethlehem-Easton, PA-NJ MSA		\$71,539	Median Housing Value			\$444,639

Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA	\$105,628	Median Gross Rent	\$1,322
Median Family Income MSA - 20524 Dutchess County-Putnam County, NY MD	\$94,443	Families Below Poverty Level	10.8%
Median Family Income MSA - 28740 Kingston, NY MSA	\$74,546		
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD	\$108,193		
Median Family Income MSA - 35084 Newark, NJ-PA MD	\$95,579		
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		
Median Family Income MSA - 45940 Trenton, NJ MSA	\$94,908		
<i>Source: 2010 U.S. & 2015 ACS and 2018 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to the November 2019 Moody's Analytics report, in the New York-Jersey City-White Plains, NY-NJ portion of the CSA, the housing market remains stagnant with both single-family and condo prices moving sideways or lower and multifamily building well below its mid-decade peak. As the financial capital of the world, the area has a high per capita income and limited exposure to manufacturing. It has strong international immigration. However, high costs, including taxes, housing, office rents and energy, a rapidly aging infrastructure, and an overreliance on wealthy overseas buyers to support real estate market are major challenges. Major industries include education and health services, professional and business services, and government. Major employers in the area include Montefiore Health System, Mount Sinai Health System, JPMorgan Chase & Co., Bank of America, N.A., and New York-Presbyterian Healthcare System.

The Nassau County-Suffolk County, NY portion of the CSA has a robust healthcare sector and a highly skilled workforce. The proximity to New York City contributes to the high per capita income. However, there are high housing costs and a lack of land available for development. The high taxes are a burden for residents and firms. Population growth is weak, and a rapidly rising number of retirement-age seniors exist. Major industries include education and health services, government, and professional and business services. Major employers in the area include Northwell Health, Henry Schein Inc., Cablevision Systems Corp., CA Inc., and Pall Corp.

Newark, NJ-PA has a well-educated and productive workforce matched with financial services, pharmaceuticals, and high-tech industries. However, prescription-drug price reform led to layoffs among major pharmaceutical companies located in the area. Also, Newark has weak population growth as well as high business and living costs. Major industries include professional and business services, education and health services, and government. Major employers in the area include Newark

International Airport, Verizon, University of Medicine and Dentistry of New Jersey, NJ Transit and United Airlines Inc.

Bridgeport-Stamford-Norwalk struggled from the middle of 2016 until the middle of 2019. The area experienced employment declines in recent years, but added jobs in the second half of 2019, primarily from healthcare and professional/business services. There are high living and business costs. Since Stamford has higher incomes, it skews the income distribution across the area. It does have a highly educated labor force and above-average exposure to high-tech. Major industries include education and health services, professional and business services, and retail trade. Major employers in the area include Sikorsky Aircraft Corp., St. Vincent's Medical Center, Stamford Hospital, Frontier Communications, and Bridgeport Hospital.

New Haven-Milford, CT MSA has the highest jobless rate among Connecticut's four metro areas. It does have a large, stable university concentration and a strong commitment by Yale to urban development. Business costs are lower here than in New York and Boston. Major industries include education and health services, as well as government, professional and business services. Major employers in the area include Yale New Haven Health System, Yale University, Verizon, Bozzuto's Inc., and Southern Connecticut State University.

Poughkeepsie-Newburgh-Middletown, NY MSA is among the nation's 10 most dependent areas on computer and electronic product manufacturing and the area is experiencing a shrinking semiconductor industry. Job growth here is the slowest in New York. Lower living costs and proximity to New York City attract commuters. Housing is affordable and single-family housing is modestly undervalued. The area has a highly educated workforce with a strong healthcare and university presence. There is a rapidly expanding senior population. Major industries include education and health services, government, and retail trade. Major employers in the area include Health Quest, IBM, GlobalFoundries, Bard College and Mid-Hudson Regional Hospital.

Trenton-Princeton, NJ MSA has a highly educated and highly skilled workforce with a concentration of white-collar and high-tech jobs. There are strong talent pipelines from Princeton University and The College of New Jersey. The workforce attracts investment in technology, finance, and professional services. Business costs are low relative to the state. The affordability of housing is above-average and close to-average living costs. The unemployment rate is among the lowest for metro areas in the Middle Atlantic region. Trenton is New Jersey's state capital and government positions make up 27 percent of total employment. As a result, the area is vulnerable to the state's poor financial condition. Major industries include government, education, and health services as well as professional and business services. Major employers in the area include Bank of America, N.A., Princeton University, Bristol-Myers Squibb, Capital Health System and New Jersey Manufacturers Insurance.

Allentown-Bethlehem-Easton, PA-NJ MSA experienced a downtown revitalization which stimulating investment and hiring. The area has below-average employment volatility and strong migration patterns with people coming from surrounding high cost areas. There is a high concentration of jobs in manufacturing. Aging infrastructure exists. The rate of appreciation of home prices is slower than elsewhere in the state. Local government finances are weak. Major industries include education and health services, professional and business services, retail trade, government, and manufacturing. Major employers in the area include Lehigh Valley Health Network, St. Luke's University Health Network, Air Products and Chemicals, Sands Bethworks Gaming LLC, and Dorney Park/Wildwater Kingdom.

The Kingston, NY MSA has below-average employment instability but also has a below-average concentration of high-wage jobs. Business costs are low for the Northeast. However, it does have an overreliance on government and few private sector growth drivers. Vacancy rates for residential properties are high and the working-age population is shrinking. Major industries include government, education and health services and retail trade. Major employers in the area include Health Alliance of the Hudson Valley, State University of New York at New Paltz, Eastern New York Correctional Facility, Northeast Center for Special Care and Ulster-Greene ARC.

Community Contacts

A review was conducted of ten community contacts completed during the examination period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, small business development, community services and housing/urban policy and research. The contacts noted the need for affordable housing programs, both homeownership and rental housing due to the high cost areas across the AA. Affordable rental housing is particularly necessary in high cost metropolitan areas such as New York City, where two-thirds of its residents remain renters. Often these renters experience a high rent burden. Multifamily lending is also a need in these areas, many of which have experienced gentrification during the rating period. For homeowners across the AA, affordable mortgages with down payment assistance and home improvement loans are needed for low- and moderate-income families purchase and repair homes. Support for seniors is necessary as many areas throughout the AA report a growing senior population. Seniors will need access to various community services as well as low-cost loans to maintain homes. Job training is noted as experienced workers age out of the workforce without enough qualified replacements. For small businesses, there is an increased need especially for small-scale businesses that struggle most to access capital. In the high cost areas across the AA, it is difficult for businesses to survive due to rising commercial real estate leases and large chains entering the local retail markets. Capacity building for community organizations including providing access to technical training and leadership development was noted. Other needs identified include:

- Access to affordable banking products and services including low cost checking and savings products and credit repair products
- Access to traditional financial services
- Financial literacy
- Financial education for start-up businesses
- Small dollar mortgage and small business loans
- Affordable rehabilitation loans
- Affordable small dollar emergency credit
- Homebuyer Education and Counseling
- Support for youth after-school programs
- Support for youth aging out of foster care
- Job training and resources

Scope of Evaluation in NY CSA

The NY CSA received a full-scope review. Bank delineated MDs and the MSA were combined in evaluating performance under each test. The NY CSA represents one of the bank's most significant markets in terms of lending, deposits, and branch distribution. The performance in the NY CSA was weighted more heavily in determining the bank's overall CRA rating.

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 High Satisfactory.

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

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 18.3 percent and 81.3 percent of the loan volume in the CSA by number and 81.0 and 16.0 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.2 percent of the loan volume in the NY CSA by number and 0.02 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	163,731	725,875	2,098	640	892,344

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	83,149,235	16,387,828	26,221	2,968,920	102,532,204

As of June 30, 2019, Chase ranked first in deposits out of 216 institutions with 30.3 percent market share.

In overall home mortgage lending, Chase ranked second with 7.7 percent market share. The top three lenders in the market are Wells Fargo Bank, N.A. (8.6 percent), Bank of America, N.A. (4.6 percent), and Quicken Loans, Inc. (4.2 percent).

In small loans to businesses, Chase ranked second out of 334 lenders with a 21.7 percent market share. Other major lenders are American Express National Bank (31.0 percent), Bank of America, N.A. (7.1 percent), and Citibank, N.A. (6.53 percent).

In small loans to farms, Chase ranked first out of 31 lenders with a 46.7 percent market share. The other major lenders in the market are Bank of America, N.A. (12.4 percent), U.S. Bank, N.A. (10.7 percent), and Wells Fargo Bank, N.A. (10.4 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 Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.0 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA, with a number of major home mortgage lenders, was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was near to the percentage of owner-occupied units and well below the aggregate distribution of loans. In moderate-income areas the proportion of loans was near to both the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was below the percentage of owner-occupied units and below the aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (7.5 percent) and competition between 334 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was near to both the proportion of businesses and the aggregate distribution, while the proportion of

small loans to businesses in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution.

- During 2014 to 2016, the proportion of small loans to businesses in low- and moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies, (2.6 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and near to the aggregate distribution of all lenders.
- During the 2014 to 2016 period, the proportion of loans to small farms in both low- and moderate-income geographies exceeded the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of Borrower

The bank exhibits good distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table P in the Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was near to both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the Multi State New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was well below the percentage of farms and significantly exceeded the aggregate distribution.

Community Development Lending

The bank has made an adequate level of CD loans.

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

There were 640 CD loans made for a total of \$2.9 billion. This represents 3.9 percent of the tier 1 capital allocated to the AA. The majority (or 66 percent) of CD loans were for affordable housing purposes, which is a critical need in this AA. Examples of CD loans in the AA include:

- In December 2015, Chase provided four loans totaling \$108.0 million to a neighborhood revitalization project that was a part of the Downtown Brooklyn Redevelopment Plan. The mixed-use housing development resulted in 129 affordable housing units in a moderate-income tract and the activity was a catalyst for other community development activities.
- In February 2018, Chase provided a \$29.7 million loan to renovate affordable housing, which consisted of a portfolio of 13 buildings in the Bronx, NY. More than one-third of the borough's residents are considered low-income. More than 50 percent of the 497 apartment units are restricted to low- and moderate-income households.
- In December 2017, Chase helped to preserve affordable housing and provided a \$18.5 million loan to renovate a multifamily property. The building is located in a moderate-income tract of Far Rockaway, NY. Of the 132 units in the building, 130 are affordable to low- and moderate-income households.

Other Loan Data

In addition to the bank's community development loans, Chase also issued 80 letters of credit totaling \$1.65 billion that had a qualified CD purpose. The letters of credit were given positive consideration to the Lending Test conclusion and supported the creation or preservation of affordable housing within the AA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, a total of 24,504 loans were funded in the amount of \$6.2 billion. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	8,822	2,394,176
Federal Housing Administration (FHA)	6,351	1,797,508
Home Affordable Refinance Program (HARP)	4,549	833,250
Veteran's Administration (VA)	973	323,766
Small Business Administration (SBA)	3,428	796,115
U.S. Department of Agriculture (USDA)	381	73,998

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.

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period investments qualified investments represent 8.9 percent of tier 1 capital allocated to the AA. A significant majority, or 81.7 percent of total investments, represents current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA, including affordable housing, community services, and revitalization/stabilization for low- and moderate-income individuals and geographies. Over 96.0 percent of the dollar volume of the bank's current period and almost all prior period investments focus on affordable housing, a primary community development need in the AA. Two percent support community services and one percent revitalization/stabilization. Additionally, the bank provided 517 grants totaling \$65.2 million to a variety of organizations that primarily support community services. The grants also supported affordable housing, economic development and to a lesser extent revitalization/stabilization. In total, the bank's investments helped create or retain 59,498 affordable housing units including housing units for low- and moderate-income senior citizens.

The bank makes occasional use of complex investments to support CD initiatives. Exclusive of grants, the bank has 347 current period CD investments. These include 70 complex Direct Investment LIHTC and NMTC transactions. Prior period investments include 88 complex Direct Investment LIHTC and NMTC investments. Forty-three current period CD investments serve as catalysts as part of a local government plan for revitalization or stabilization to encourage further growth or improvements. In addition, the bank shows leadership with nine investments which supports the bank-developed New Skills at Work initiative, or the Healthcare Workforce Pathways with Hostos and Montefiore initiative. Leadership also included the bank's commitment to support and strengthen Community Development Financial Institutions (CDFIs).

Qualified Investments - New York-Newark CSA										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York-Newark CSA	479	646,619	864	2,878,934	1,343	94.4	3,525,553	97.0	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	11	20,796	44	76,780	55	3.9	97,576	2.7	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	16	11,026	7	315	23	1.6	11,341	0.3	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 bank's financial reporting system.

Examples of CD Investments in the AA include:

- In December 2019, the bank made a \$23.7 million equity investment to a community development project for affordable housing in the AA. Eighty-eight housing units were created for low- and moderate-income seniors. This is a Direct Investment LIHTC transaction supporting affordable housing.
- In December 2016, the bank made three investments totaling \$20.4 million in the New York State Housing Finance Agency (HFA) 2016 Affordable Housing Revenue Bonds (Series I). The purpose of the proceeds of these bonds was to finance the 2016 Series I Project. HFA's mission is to create and preserve high quality affordable multi-family rental housing units that serves communities across the state of New York.
- From 2014 through 2019, five grants totaling \$800,000 were provided to a nonprofit organization for continued support of its financial center. The mission of this small business development organization is to improve the economic prospects of traditionally underserved groups, with a focus on providing training and financial assistance to low- and moderate-income entrepreneurs and their communities to help grow revenue and create jobs thereby stimulating economic stability and growth within the bank's AA.

Statewide Investments in Connecticut and New Jersey

The bank has 78 current and prior period investments totaling \$108.9 million with and without a P/M/F to serve AAs in Connecticut and New Jersey. These CD investments primarily support affordable housing and community services, with revitalization/stabilization to a lesser extent. These investments represent 3.1 percent of total qualified investments in and surrounding the NY CSA broader area including Connecticut and New Jersey. Of the \$108.9 million, 89 percent have a P/M/F to serve AAs. The investments supported the bank's overall performance in the NY CSA.

SERVICE TEST

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

Based on a full-scope review, the bank'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.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively below and near to the percentage of the population. The bank had 54 branches in low-income geographies and 139 branches in moderate-income geographies. The distribution was augmented by 13 MUI tract branches that serve low-income tracts and 115 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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-Newark, NY-NJ-CT-PA CSA	100	865	99.8	6.2	16.1	29.1	47.7	11.6	21.7	32.4	34.1

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 3,259 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 27.9 percent over the prior rating period to 243 (7.5 percent) deposit-taking ATMs in low-income geographies and 602 (18.5 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed significant increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
NYCSA	44	79	+4	-3	-26	-10

The

bank's opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened four branches in low-income geographies and closed three branches in moderate-income geographies. The closures in moderate-income geographies were the results of reduced customer usage trends and proximity to other Chase branches based on the bank's retail branch consolidation strategy. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday 8:30 am to 6:00 pm and Saturday 9:00 am to 2:00 pm. A limited number of branches are open on Sunday from 10:00 am to 2:00 pm. All retail banking services are available within the low- and moderate-income branches.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs. The CD services positively affected the service test performance.

Bank employees provided 9,400 CD services to 287 organizations. These employees provided a total of 49,000 hours of service. A substantial amount of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The CD services provided were responsive to the needs identified in the community, particularly financial literacy, and programs for low- and moderate-income youth. The following are examples of CD services provided in this AA:

- A bank employee provided 250 hours of board service to an organization focused on serving children from low- and moderate-income backgrounds. The employee played an integral role in shaping the nonprofit's strategic goals and executing directives that benefit the needs of the community.
- A bank employee provided 220 hours of board service to a community foodbank that serves as the state's largest anti-hunger and anti-poverty organization.
- Bank employees assisted a nonprofit with a financial literacy workshop focused on teaching the basics of money management and credit building to low-income women/clients. The workshop is responsive to the needs of these low-income women, many of whom lack the skills to build financial freedom.

Multistate Metropolitan Statistical Area Rating

Chicago-Naperville, IL-IN-WI CSA (Chicago CSA)

CRA rating for the Chicago CSA³: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- An adequate geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD loans that positively affected the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and economic develop needs.
- Some use of complex investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Chicago CSA

The Chicago CSA is the bank's 4th largest rating area based on its total deposits in the CSA of \$87.8 billion, representing 6.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 328 branches and 1,400 deposit-taking ATMs within the rating area, representing 6.6 percent of total branches and 8.7 percent of total ATMs. The bank originated and purchased approximately \$60.5 billion in loans or 8.7 percent of total bank loan originations and purchases during the evaluation period in the CSA.

According to FDIC Deposit Market Share data as of June 30, 2019, there were 180 banks s operating 2,638 branches in the Chicago CSA. The bank had deposits of \$87.8 billion, ranking it first in deposit market share with 21.1 percent. The next three largest competitors and their deposit market shares are BMO Harris Bank (15.3 percent), Bank of America, N.A. (8.6 percent), and Fifth Third Bank (5.8 percent).

Chase has delineated a significant portion of the Chicago-Naperville-Elgin, IL-IN-WI MSA and Michigan City-LaPorte, IN MSA within the CSA as its AA. Refer to appendix A for a complete listing of the counties included in the AA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Chicago CSA. The CSA poses challenges to home mortgage lenders in the AA, including Chase. The CSA is a high cost housing area, limiting access to affordable homeownership among many low-income and some moderate-income borrowers. The median housing value in the CSA is \$444,639, which ranges from 2.7 to 4.0 times the median income in each MSA for the CSA, 4.0 times the averaged moderate-income, and 6.4 times the averaged low-income. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

Assuming a 30-year mortgage with a five percent interest rate, three percent down payment and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$36,555 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$174,233 mortgage with a payment of \$1,097 per month; a moderate-income borrower earning \$58,488 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$278,796 mortgage with a payment of \$1,755 per month.

The poverty level across the AA was considered in the 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 Chicago CSA, the overall household poverty level was 10.6 percent.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,232	14.1	23.8	29.5	31.5	1.1
Population by Geography	9,597,783	9.8	23.4	32.4	34.2	0.3
Housing Units by Geography	3,831,216	10.2	22.5	32.3	34.7	0.3
Owner-Occupied Units by Geography	2,246,618	4.4	17.7	35.8	41.9	0.1
Occupied Rental Units by Geography	1,227,488	17.4	29.6	27.6	24.8	0.6
Vacant Units by Geography	357,110	21.9	27.9	26.1	23.6	0.4
Businesses by Geography	652,715	4.9	15.6	30.5	48.6	0.5
Farms by Geography	11,629	3.2	13.8	41.2	41.8	0.1
Family Distribution by Income Level	2,289,527	23.4	16.4	18.8	41.4	0.0
Household Distribution by Income Level	3,474,106	25.4	15.3	17.1	42.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$235,559
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,032
Median Family Income MSA - 23844 Gary, IN		\$64,075	Families Below Poverty Level			10.6%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137				
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA		\$58,424				

*Source: 2015 ACS and 2019 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.*

Economic Data

According to the November 2019 Moody's Analytics report, employment growth in the Chicago area has decelerated or abated in most industries and the housing market is among the weakest in the top U.S. metro areas. The area is a major center for business, distribution, transportation, and finance. It has a large talent pool as well as several highly regarded educational institutions. However, the area is showing weak population trends and has struggled with high crime rates. Chicago and Illinois are both grappling with mounting pension obligations and a shrinking population, both of which are placing added financial strain on city and state budgets. Major industries include professional and business services; educational and health services; and leisure and hospitality. Major employers in the area include Advocate Health Care System; Northwestern Memorial Healthcare; University of Chicago; JP Morgan Chase; and Amazon.

Community Contacts

A review was conducted of five community contacts completed during the examination period with organizations located throughout the area. The organizations contacted focus on areas such as housing/urban policy and research and affordable housing. The contacts noted the need for access to traditional financial services for residents of LMI communities, particularly in the southside of Chicago; Gary, Indiana; East Chicago; and Hammond in Lake County, Indiana. Contacts also noted the need for smaller dollar mortgage loans as nonprofit organizations seem to hold a disproportionate share of the single-family mortgage market in low-income areas with lower property values. Contacts also discussed affordable housing and the need to construct more affordable rental housing in areas that provide low-income households with access to better employment and workforce development opportunities that can lead to financial self-sufficiency. Other needs identified include:

- Access to affordable rental housing
- Access to affordable, conventional mortgages
- Smaller dollar mortgage loans
- Down payment assistance programs
- Smaller dollar loans for smaller businesses
- Access to second chance checking accounts, credit builder loans, and branches in low- and moderate-income areas
- Financial literacy training

Scope of Evaluation in Chicago CSA

The Chicago CSA received a full-scope review. The MSAs within the CSA were combined in evaluating performance with each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to the credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 36.8 percent and 62.8 percent of the loan volume in the CSA by number and 88.8 percent and 9.5 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.2 percent of the loan volume in the CSA by number and 0.02 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago CSA	166,548	284,344	967	369	452,228

Dollar Volume of Loans (000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Chicago CSA	53,688,554	5,740,670	13,585	1,028,313	60,471,122

Chase ranked first in deposits within the CSA with 21.1 percent market share.

In overall home mortgage lending, Chase ranked first with 8.5 percent market share. This is a very competitive market with 1,057 home mortgage lenders and 180 depository institutions. The other top lenders were Wells Fargo Bank, N.A. (6.3 percent), Guaranteed Rate Inc. (5.9 percent), and U.S. Bank, N.A. (4.2 percent).

In small loans to businesses, Chase ranked first with 26.9 percent market share. This is a highly competitive market with 233 small business lenders. The other top lenders were American Express National Bank (16.6 percent) and Citibank, N.A. (8.8 percent).

In small loans to farms, Chase ranked first out of 44 lenders with a 20.3 percent market share. The other major lenders in the market are John Deere Financial, F.S.B. (13.6 percent), First Midwest Bank (13.5 percent), and First National Bank of Omaha (11.4 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 Multi State Chicago section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.4 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA, with 1,057 home mortgage lenders, was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was well below both the percentage of owner-occupied units and the aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below the percentage of owner-occupied units and near to the aggregate distribution of loans, while performance in moderate-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating:

- The smaller proportion of businesses in low-income geographies (4.9 percent) and competition between 233 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to the proportion of businesses and below the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State Chicago 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (2.6 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and near to the aggregate distribution of all lenders.
- During the 2014 to 2016 period, performance was weaker. The proportion of loans to small farms in both low- and moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Chicago section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating:

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.

- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of loans to moderate-income families exceeded both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

Refer to Table R in the Multi State Chicago 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.

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating:

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the Multi State Chicago 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

- During 2014 to 2016, the bank’s performance was consistent with performance between 2017 and 2019. The bank’s percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

Community Development Lending

The bank 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’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans

There were 369 CD loans made for a total of \$1 billion. This represents 8.7 percent of the allocated tier 1 capital. The loans were responsive to the identified needs of the AA. The majority (56 percent) of CD loans were for affordable housing purposes followed by community services (42 percent). Examples of CD loans in the AA include:

- In October 2014, Chase provided a \$10.0 million loan to a school district that primarily serves LMI students in the community. The funds were used to facilitate the purchase of equipment and construction/reconstruction projects.
- In June 2016, Chase provided a \$13.3 million loan to improve a multifamily property in a middle-income census tract of Chicago. Of the 124 units, 121 are occupied by LMI families.
- In April 2019, Chase funded a \$5.6 million loan located in a low-income census tract in Chicago. The loan helped to preserve 112 affordable units occupied by LMI families.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. As shown in the table below, a total of 26,643 loans were funded in the amount of \$4.9 billion. Refer to the comments in the Product Innovation and Flexibility section of this PE for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	9,202	1,735,384
FHA	7,983	1,338,818
HARP	5,363	807,306
VA	2,048	480,720
SBA	1,731	462,999
USDA	316	42,594

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, although rarely in a leadership position. Current and prior period investments represent 28.3 percent of tier 1 capital allocated to the AA. A significant majority, or 95.8 percent, of total investments are current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. Qualified investments primarily supported affordable housing and community services including economic and workforce development. Eighty-one percent of qualified investments were provided for community service needs. Seventeen percent supported affordable housing. The remaining supported economic development and the revitalization/stabilization of distressed areas. Affordable housing-related investments created or retained 26,921 housing units for low- and moderate-income individuals and families. Of total qualified investments, grants totaled \$43.9 million to a variety of organizations primarily supporting community service and economic development. In some occurrences, grants were made over multiple years.

The bank rarely uses complex investments to support CD initiatives. Complex investments represent 13.9 percent of total investments and 2.6 percent of total investments serve as catalysts for future growth and other improvements. The bank's complex investments include Direct Investor LIHTC and NMTC transactions. Direct Investor LIHTC require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance.

Qualified Investments - Chicago-Naperville, IL-IN-WI CSA										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago-Naperville, IL-IN-WI CSA	137	132,996	542	3,064,189	679	100	3,197,185	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.

Examples of CD Investments in the AA include:

- Between September 2015 and July 2018, the bank provided twelve Educational Purposes Tax and Grant Anticipation Notes totaling \$2.5 billion to the Chicago Board of Education (Board), in Chicago, Illinois. The Board is responsible for the governance, organizational, and financial oversight of Chicago Public Schools (CPS) - City of Chicago School District 299. The proceeds were used, together with certain funds available to the Board, to pay ordinary and necessary expenditures for educational purposes, and to pay the issuance costs. Per the National Center for Education Statistics, the majority or 83.5 percent of the local student population is eligible for the Federal Free or Reduced Lunch program in the CPS.
- In December 2018, the bank made a \$16.5 million investment in a LIHTC Direct Investor project. The investment supports the development of a four-story building containing 60 housing units restricted to those 62 years or older and at 60 percent or less of AMI. Sixteen of the units will receive a rental subsidy through a Project-Based Section 8 contract. A non-profit organization will provide supportive services with a full-time on-site manager available to help link and refer residents to area services according to their individual needs. There is strong demand in the market for senior

affordable housing evidenced by two older adult LIHTC properties in the market which had current occupancies of 100 percent and waitlists, as well as a significant senior population growth in the area since 2010.

- In September 2019, the bank made a \$12.1 million equity investment in a LIHTC project located in Pleasant Prairie, Wisconsin. The investment will support new construction of a 140-unit family development with 84 units set aside for low- and moderate-income families. Service organizations will provide and coordinate services for job skills training, financial literacy, community building, and federal benefits assistance.

SERVICE TEST

The bank’s performance under the Service Test in the Chicago CSA is rated Outstanding.

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems. Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is near to the percentage of the population. The bank had 24 branches in low-income geographies and 54 branches in moderate-income geographies. The distribution was augmented by five MUI tract branches near low-income tracts and 41 MUI tract branches near moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the adjacent MUI branches and determined they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago-Naperville, IL-IN-WI CSA	100	328	98.9	7.3	16.5	27.4	48.8	9.8	23.4	32.4	34.2

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered alternative delivery systems over the evaluation period. This included review of the bank’s 1,400 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-

taking ATMs in low- and moderate-income geographies by 33.7 percent over the prior rating period to 115 (8.2 percent) deposit-taking ATMs in low-income geographies and 247 (17.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Chicago-Naperville, IL-IN-WI CSA	16	67	0	-6	-18	-27

The bank's opening and closing of branches generally 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. The bank opened four branches and closed four branches in low-income geographies and opened one branch and closed seven branches in moderate-income geographies. Branch closures were due to reduced customer usage, and proximity to other Chase branches. The branch closures in moderate-income geographies generally did not adversely affect the distribution of branches relative to the population residing in the geographies. Branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday 8:30 am to 6:00 pm, and Saturday 9:00 am to 2:00 pm. A limited number of branches offer Sunday hours, often from 10:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs. The CD services positively affected the service test performance.

Bank employees provided their financial or job-specific expertise and/or technical assistance for 6,100 CD services to 130 organizations since the last evaluation. This is a total of 34,300 hours over a six-year period. A substantial amount of the bank's assistance was to organizations that provide services to low- and moderate-income individuals and families. The CD services provided were responsive to the needs identified in the community, particularly financial literacy training:

- A bank employee facilitated financial literacy workshops for over 300 low- and moderate-income individuals. These workshops were often performed in coordination with a nonprofit organization that served the low- and moderate-income community. The education helped equip participants with the knowledge and skills necessary to make good financial decisions and become self-sufficient.
- Five bank employees provided training to low- and moderate-income individuals, through service to a nonprofit organization dedicated to educating students in grades K-12 about entrepreneurship, work readiness, and financial literacy through the experiential, hands-on program.

Multistate Metropolitan Statistical Area Rating

Philadelphia-Reading-Camden, PA-NJ-DE MMSA (Philadelphia MMSA)

CRA rating for the Philadelphia MMSA ⁴: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- A good geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in CD lending that had a significantly positive affect on the rating.
- The extensive use of flexible loan products, that positively affected the rating.
- An excellent level of qualified CD investments that demonstrated excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Philadelphia MMSA

The Philadelphia MMSA is Chase's 28th largest rating area based on its deposits of \$198.4 million, representing less than one percent of the bank's total deposits. As of December 31, 2019, the bank operated 14 branches and 80 deposit-taking ATMs within the rating area, representing 0.2 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$1.1 billion in loans or 0.2 percent of total bank loan originations and purchases during the evaluation period in the MMSA.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 109 banks s operating 1,631 branches in the area. Chase ranked 55th with a 0.05 percent market share. Capital One, N.A. had the largest deposit market share with 29.9 percent followed by TD Bank, N.A. (26.5 percent), and Wells Fargo Bank, N.A. (6.7 percent).

Chase's AA is comprised of geographies in Delaware, New Jersey, and Pennsylvania and contains a substantial portion of the MDs within Philadelphia-Camden-Wilmington MSA. Refer to appendix A for a complete listing of counties included in the AA.

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.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Philadelphia MMSA. Table A indicates that approximately 22.2 percent of families in the AA are low-income. The Philadelphia MMSA's cost of housing is generally affordable for some low-income and most moderate-income borrowers. The median housing value in the Philadelphia MMSA ranges from 2.4 to 4.3 times the median income across the MMSA, 3.7 times the average moderate-income, and approximately six times the average low-income, indicating OOU's are not affordable to some low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Philadelphia MMSA, assuming a 30-year mortgage with a 5 percent interest rate, 3.0 percent down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,524 per year (or less than 50 percent of the FFIEC adjusted median family income in the MMSA) could afford a \$193,166 mortgage with a payment of \$1,216 per month; a moderate-income borrower earning \$64,838 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$309,055 mortgage with a payment of \$1,945 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Philadelphia MMSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,370	7.2	24.4	36.3	30.7	1.5
Population by Geography	5,578,302	7.1	23.3	37.6	31.7	0.4
Housing Units by Geography	2,263,278	7.2	24.3	37.1	31.2	0.2
Owner-Occupied Units by Geography	1,381,586	3.9	18.9	40.4	36.9	0.0
Occupied Rental Units by Geography	684,058	12.1	32.1	32.8	22.5	0.5
Vacant Units by Geography	197,634	13.8	35.2	29.3	21.4	0.3
Businesses by Geography	407,923	4.0	18.0	37.7	39.8	0.6
Farms by Geography	8,584	1.6	14.1	45.7	38.5	0.1
Family Distribution by Income Level	1,327,581	22.2	17.3	19.8	40.7	0.0
Household Distribution by Income Level	2,065,644	25.3	15.6	16.9	42.1	0.0
Median Family Income MSA - 15804 Camden, NJ		\$87,133	Median Housing Value			\$243,122
Median Family Income MSA - 33874 Montgomery County-Bucks County- Chester County, PA		\$99,939	Median Gross Rent			\$1,053
Median Family Income MSA - 37964 Philadelphia, PA		\$56,411	Families Below Poverty Level			9.4%
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$80,707				
<i>Source: 2015 ACS and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the November 2019 Moody's Analytics report, the area economy is strong. The area has world-class educational institutions and is a center for healthcare and medical research. Growth in total employment is in the top 10 among metro areas in the Northeast and firmly outpaces the national average. The unemployment rate has been historically low for the area due to an expanding labor force. The housing market is also making inroads. After a brief slowdown in 2018, homebuilding picked up in the first three quarters of 2019, and house price appreciation outpaced the Pennsylvania and U.S. averages. Major employment industries include college, universities and professional schools, and federal government. Top employers include University of Pennsylvania Health System, Thomas Jefferson University, Comcast, Drexel University and Aramark, Corp. Collectively, the federal, state, and local government is a significant employer in the area. The area has a relatively low population growth. Prohibitive business taxes push firms out of the area. The 2018 poverty levels across the AA are the greatest in the Philadelphia, PA MD at 20.4 percent compared to the national average of 13.1 percent. This had an impact on meeting basic financial needs and home mortgage lending.

Community Contacts

A review was conducted of five community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on affordable housing, economic development, and community services. Contacts noted concerns regarding foreclosures and negative equity, low-income wage earners being able to earn a living wage, aging housing stock, rent burden, poverty levels, and access to credit for small business. The contacts identified the following needs in the area:

- Affordable housing and commercial rehabilitation and preservation
- Foreclosure prevention
- Financing for small businesses including micro-loans for small business working capital
- Small dollar loans
- Financial literacy
- Technical assistance for small business
- Workforce housing
- Branches in low- to moderate-income neighborhoods

Scope of Evaluation in the Philadelphia MMSA

The rating for the Philadelphia MMSA is based on a full-scope evaluation. Since the bank did not enter the Philadelphia MMSA until December 2018, there was less than one month of performance to evaluate for 2018, which would not provide meaningful conclusions. Therefore, the evaluation for the Philadelphia MMSA includes only 2019 performance.

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 High Satisfactory.

Based on a full-scope review, the bank's performance in the Philadelphia MMSA is good. Aggregate lending data for 2019 was not available at the time this evaluation was completed and was not used in the lending test analysis for the Philadelphia MMSA.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 20.8 percent and 78.8 percent of the loan volume in the MMSA by number and 84.2 and 13.9 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.3 percent of the loan volume in the MMSA by number and 0.05 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	3,081	11,659	53	2	14,795

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	909,346	150,631	513	18,995	1,079,485

As of June 30, 2019, Chase ranked 55th in deposits out of 109 institutions with 0.05 percent market share.

In overall home mortgage lending, Chase ranked ninth out of 796 lenders with 2.1 percent market share. The top three lenders in the market are Wells Fargo Bank, N.A. (10.1 percent), PNC Bank, N.A. (3.3 percent), Citizens Bank of PA (3.1) and Quicken Loans, Inc. (3.1 percent).

In small loans to businesses, Chase ranked second out of 219 lenders with a 9.7 percent market share. Other major lenders are American Express National Bank (24.3 percent), Wells Fargo Bank, N.A. (7.4 percent), and Citibank, N.A. (7.0 percent).

In small loans to farms, Chase ranked second out of 31 lenders with a 17.7 percent market share. The other major lenders in the market are Branch Banking and Trust Co. (20.2 percent), John Deere Financial, F.S.B. (11.3 percent), and U.S. Bank, N.A. (7.9 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.9 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA, with 796 home mortgage lenders, was also considered.
- During 2019, the proportion of loans in low-income areas was well below the percentage of owner-occupied units, while in moderate-income areas the proportion of loans exceeded the percentage of owner-occupied units.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (4.0 percent) and competition between 219 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- During 2019, the proportion of small loans to businesses in low-income geographies was well below the proportion of businesses, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses.

Small Loans to Farms

Refer to Table S in the Multi State Philadelphia 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (1.6 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.

- The fact that farm lending is not a focus of the bank was also considered.
- During 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies exceeded the proportion of farms in those geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Philadelphia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above under the Description of this Full-Scope AA, particularly the cost of housing and level of poverty in portions of the MMSA.
- During 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families, while the proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is adequate. The following information was taken into consideration when determining this rating.

- During 2019, the proportion of loans to businesses with revenues of \$1 million or less was below the percentage of small businesses located in the AA.

Small Loans to Farms

Refer to Table T in the Multi State Philadelphia 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- During 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of farms.

Community Development Lending

The bank is a leader in CD lending.

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

There were two CD loans made for a total of \$19.0 million. This represents 74.4 percent of tier 1 capital. Eighty-four percent supported revitalization/stabilization and 16 percent supported affordable housing.

The following two CD loans were made in the AA:

- In March 2019, Chase originated a \$13.0 million bridge loan for the purposes of revitalizing a community in Camden, NJ. The purpose was to facilitate the NMTC financing for the construction of a new manufacturing facility in a low-income census tract of Camden, NJ. The project is part of three city plans (Future Camden Master Plan, Comprehensive Revitalization Plan and General Reexamination of the Master Plan) to revitalize the area. It will help redevelop 31 acres of a former brownfield into four buildings in an underutilized area. The opening of the manufacturing facility will result in the creation of 210 jobs.
- In November 2019, Chase originated a \$3.0 million term loan to an apartment complex in Philadelphia, PA. The building has 55 units for LMI individuals and families. The Philadelphia Housing Authority Department sponsored the project.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 1,486 loans totaling nearly \$255.2 million in the AA. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	592	116,142
FHA	548	79,269
HARP	201	26,093
VA	107	23,697
SBA	9	4,556
USDA	29	5,435

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments represent 94.1 percent of Tier 1 capital allocated to the AA. Bank operations commenced in the AA December 2018.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA including affordable housing and affordable rental housing, community service, and economic development. Current period dollar investments were 74.7 percent revitalization/stabilization, 12.9 percent community service, and 12.4 percent affordable housing. Current period affordable housing investments created 293 low- and moderate-income housing units for individuals and families. The bank provided 67 grants totaling \$10.9 million to a variety of community organizations, primarily revitalization/stabilization and community service.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Current period complex dollar investments represent 54.4 percent or \$13.1 million of investments and included two NMTC transactions totaling \$10.6 million. Twelve or 74.7 percent of investment dollars are catalysts for future growth and other improvements.

Qualified Investments - Philadelphia-Reading-Camden PA-NJ-DE MD CSA										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia MMSA	78	56,543	71	24,032	149	52.3	80,575	28.2	0	0
Other:										
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	31	52,710	168	246,181	199	37.2	298,892	70.3	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	41	6,607	10	23,565	51	10.5	30,172	1.5	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.

Examples of CD Investments in the AA include:

- In December 2019, the bank provided a \$1.5 million grant for a three-year investment to a collaborative aimed at promoting inclusive growth in three impoverished neighborhoods in Wilmington, (West, East and Northeast) Delaware. The collaborative will use the funds to support affordable housing development, small businesses, and community facilities, while addressing social determinants of health, including access to healthy foods, and health care facilities, through partnerships with the healthcare sector. The grant will build the capacity of community-based organizations to preserve or rehab over 100 affordable housing units; provide 48 small business loans totaling \$1.0 million; and develop community facilities that create assets and resources for the LMI community.
- In May 2019, the bank provided a \$2.5 million grant to an organization for PRO-N 2018 located in Philadelphia, PA. Along with CDFI partners, the organization will prioritize economic development and housing outcomes of the Kensington Avenue commercial corridor, all composed of low- and moderate-income tracts. Aligning with the Heart of Kensington Neighborhood Development Plan to build community capacity and wealth and protect long-term residents and businesses from displacement, the CDFIs will implement an equitable investment strategy and support affordable housing options on surrounding blocks.

CDFIs will also identify and cultivate local entrepreneurs, support existing and attract new businesses, finance redevelopment of small-scale and large-scale mixed-use properties to meet local needs, provide flexible capital tailored to business needs, deliver individualized coaching and technical assistance to businesses, and support pathways to homeownership and affordable rental housing options. The efforts will attract/retain 85 businesses, create/preserve 300 jobs, 115 residential units, 20 new homeowners, address 45 vacant/blighted properties, and drive \$85.0 million in additional public/private investments. This activity serves as a catalyst for other community development activities and is part of a local government plan for revitalization or stabilization

- In March 2019, the bank originated a \$7.9 million equity investment to construct a new manufacturing facility located in Camden NJ using NMTC and other capital sources. The Project is in a low-income census tract and part of three city plans to revitalize this area: Future Camden Master Plan, Comprehensive Revitalization Plan, and General Reexamination of the Master Plan and Master Plan Amendment.

Four buildings totaling approximately 379,000 SF will be constructed on 31 acres. When the facility opens, it will create 210 permanent jobs. This development will revitalize an underutilized industrial area and eliminate a large, blighted fronting on a heavily trafficked corridor to the heart of Camden.

Statewide Investments in Delaware and Pennsylvania

The bank has 250 current and prior period investments totaling \$329.0 million with and without a P/M/F to serve AAs in the states of Delaware and Pennsylvania. These CD investments primarily support affordable housing, community services and revitalization/stabilization. Qualified investments in the broader statewide areas represent 71.8 percent of total qualified investments. These investments support the bank's overall excellent performance in the Philadelphia MMSA.

SERVICE TEST

The bank's performance under the Service Test in Philadelphia MMSA is rated Outstanding.

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively near to and exceeds the percentage of the population. The bank had one branch in a low-income geography and four branches in moderate-income geographies. The distribution was augmented by four MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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	Upper	Low	Mod	Mid	Upper
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA	100	14	100	7.1	28.6	14.3	50.0	9.0	25.7	32.0	33.0

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

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 80 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank had 3 (3.7 percent) deposit-taking ATMs in low-income geographies and 18 (22.5 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed negligible change in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA	14	0	+1	+4	+2	+7

The bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not close any branches in the low- and moderate-income geographies and opened one and four branches, respectively, in low- and moderate-income geographies.

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 low- and moderate-income individuals. Generally, branches are open Monday through Friday from 9:00 am to 5:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available within the low- and moderate-income branches.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs. The CD services positively affected the service test performance.

Bank employees provided 875 CD service activities consisting of technical assistance and/or job-specific expertise to 41 organizations for a total of 5,666 hours of service, including 1,896 hours of board service over a three-year period. The bank's assistance was primarily to organizations that provide services to low- and moderate-income individuals and families. The CD services were responsive to the needs identified in the community, particularly affordable housing, and foreclosure prevention. The following are examples of CD services provided in this AA:

- A bank employee provided 98 hours of board service over a two-year period to a community organization that provides affordable housing construction and home renovation to low- and moderate-income families.
- Two bank employees provided 443 hours of board service during a three-year period to a community organization that provides homebuyer education, foreclosure prevention programs, training, education in personal finance management, self-employment, and work readiness to low- and moderate-income women and minorities.

Multistate Metropolitan Statistical Area Rating

Washington-Arlington-Alexandria MMSA (DC MMSA)

CRA rating for the DC MMSA is 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:

- An excellent level of lending activity.
- A good geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in CD lending, which had a significantly positive affect on the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified CD investments, that demonstrated excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in the DC MMSA

The DC MMSA is Chase's 27th largest rating area based on its total deposits of \$269.0 million, representing less than one percent of the bank's total deposits. As of December 31, 2019, the bank operated 30 branches and 149 ATMs within the rating area, representing 0.6 percent of total branches and 0.9 percent of total ATMs. The bank originated and purchased approximately \$4.0 billion in loans or 0.6 percent of total bank loan originations and purchases during the evaluation period in the MMSA.

The bank initially entered the DC MMSA in September 2018 and further expanded its presence in April 2019. According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 75 banks operating 1,491 branches in the MMSA. Chase ranked 39th with a deposit market share of 0.1 percent. The top three banks and their deposit market share were E*TRADE Bank (15.6 percent), Bank of America, N.A. (14.6 percent), and Capital One, N.A. (13.9 percent). Both Bank of America, N.A. and Capital One, N.A. have substantially larger branch networks.

Chase's AA within the DC MMSA consists of geographies within the District of Columbia (DC), Maryland, and Virginia. Refer to appendix A for a complete list of the geographies.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the DC MMSA. Table A indicates that approximately 22.0 percent of families in the AA are low-income. The MMSA is a high cost housing area, limiting access to affordable homeownership among LMI borrowers. The median housing value in the MMSA is \$427,189 while the

NAR 4Q2019 median sales price of a single-family home is \$436,200. 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 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 \$58,327 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$210,405 mortgage with a payment of \$1,130 per month; a moderate-income borrower earning \$93,322 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$336,644 mortgage with a payment of \$1,807 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: DC MMSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,193	10.3	21.2	32.3	35.0	1.3
Population by Geography	5,182,992	9.5	20.8	33.1	36.1	0.6
Housing Units by Geography	1,996,818	9.9	20.7	33.2	35.8	0.5
Owner-Occupied Units by Geography	1,152,488	3.9	16.5	35.5	43.9	0.2
Occupied Rental Units by Geography	718,931	18.3	26.8	30.1	23.9	1.0
Vacant Units by Geography	125,399	16.1	23.4	29.7	30.3	0.5
Businesses by Geography	527,309	4.7	18.0	33.3	43.3	0.6
Farms by Geography	7,918	3.9	18.2	36.5	41.3	0.1
Family Distribution by Income Level	1,211,323	22.0	16.3	19.9	41.9	0.0
Household Distribution by Income Level	1,871,419	22.9	16.4	18.5	42.1	0.0
Median Family Income MSA - 23224 Frederick-Gaithersburg- Rockville, MD		\$112,655	Median Housing Value			\$427,189
Median Family Income MSA - 47894 Washington-Arlington- Alexandria, DC-VA-MD-WV		\$106,105	Median Gross Rent			\$1,562
			Families Below Poverty Level			5.8%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the November 2019 Moody's Analytics report, the area economy is strong. The area has a high per capita income and educated workforce. The area is a major center for computer system design and tech-related professional services as well as a popular tourist destination. The labor market is strong and the pace of employment growth in the area is ahead of the U.S. average. Amazon has designated the area for its second headquarters location and the first employees have started work. Federal payrolls have stabilized in the past year after two years of declines. The unemployment rate has dropped to a

cycle low of 3.0 percent even as the labor force has continued to grow. Major employment industries include professional and business services, government, and education and health services. Collectively, the federal, state, and local government is a significant employer in the area. Other major employers include Naval Support Activity Washington, Joint Base Andrews-Naval Facility, MedStar Health, Marriott International, Inc. and Inova Health System. The area does have above average living costs and high business costs. In terms of housing, lean inventories and improvement in sales will continue to put upward pressure on house prices at the expense of affordability.

Community Contacts

A review was conducted of six community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on several areas including affordable housing, economic development, community services, as well as asset development and financial stability. Contacts noted concerns regarding housing affordability and access to affordable housing. Low-income individuals and households are being pushed out of communities as more affluent individuals move in causing home prices to increase dramatically. Despite the growing economic prosperity in the area most low-income residents are being left behind. The contacts identified the following needs in the area:

- Affordable housing development and preservation
- Financing for small businesses
- Workforce development and job training programs to help individuals obtain living wage jobs
- Employment readiness for youth and youth programming
- Support for non-English speakers
- Asset development for low- and moderate-income households
- Access to healthy foods and health services
- Access to traditional financial services

Scope of Evaluation in DC MMSA

The DC MMSA received a full-scope review. Since the bank did not enter the DC MMSA until September 2018, there was less than three months of performance to evaluate for 2018, which would not provide meaningful conclusions. Therefore, the evaluation for the DC MMSA includes only 2019 performance.

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. Aggregate lending data for 2019 was not available at the time this evaluation was completed and was not used in the lending test analysis for the DC MMSA.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 17.0 percent and 82.6 percent of the loan volume in the MMSA by number and 83.9 and 9.2 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.3 percent of the loan volume in the MMSA by number and 0.03 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	6,016	29,268	130	30	35,444

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	3,343,722	366,352	1,252	274,392	3,985,718

As of June 30, 2019, Chase ranked 39th in deposits out of 75 institutions with 0.1 percent market share.

In overall home mortgage lending, Chase's rank and market share exceeded its deposit market share competing with 744 mortgage lenders. The top three lenders in the market are Wells Fargo Bank, N.A. (8.4 percent), Navy Federal Credit Union (4.0 percent), and Branch Banking and Trust Co. (3.20 percent).

In small loans to businesses, Chase ranked second out of 190 lenders with a 12.7 percent market share. Other major lenders are American Express National Bank (24.4 percent), Bank of America, N.A. (12.3 percent), and Branch Banking and Trust Co. (7.4 percent).

In small loans to farms, Chase ranked first out of 27 lenders with a 26.0 percent market share. The other major lenders in the market are John Deere Financial, F.S.B (20.5 percent), Wells Fargo Bank, N.A. (13.3 percent), and Bank of America, N.A. (11.6 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 Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies particularly OOU's (3.9 percent) as well as high competition constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOU's in those geographies.

- During 2019, the proportion of loans in low-income geographies exceeded the percentage of owner-occupied units, while in moderate-income areas the proportion of loans was below the percentage of owner-occupied units.

Small Loans to Businesses

Refer to Table Q in the Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (4.7 percent) and competition between 190 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- During 2019, the proportion of small loans to businesses in low- and moderate-income geographies was below the proportion of businesses.

Small Loans to Farms

Refer to Table S in the Multi State 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (3.9 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- During 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State 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.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above under the Description of this Full-Scope AA, particularly, the cost of housing and level of poverty in portions of the MMSA.
- During 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families, while the proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Examiners considered competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- During 2019, the proportion of loans to businesses with revenues of \$1 million or less was below the percentage of small businesses located in the AA.

Small Loans to Farms

Refer to Table T in the Multi State 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.

- During 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of farms.

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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

There were 30 CD loans made for a total of \$274.4 million. This represents 792 percent of the tier 1 capital allocated to the AA. The funding focused on the area's revitalization, stabilization, and affordable housing, all of which are community needs.

Examples of CD loans in the AA include:

- In February 2019, Chase originated \$21.1 million loan to partially finance and redevelop an apartment complex in the Washington, DC. area. The complex has 13 buildings and 272 units for low- and moderate-income households.
- In October 2018, Chase funded a \$115 million loan for a mixed-use project in the low-income Brookland neighborhood of Washington, DC. The project meets the mission of the Brookland/CUA Metro station Small Area Plan which aims for growth, development, and revitalization of under-utilized areas within a quarter mile (or 10-minute walk) from the Brookland/CUA Metro Station. It consists of 562 apartment units, 46,000 square feet of retail space, and 27 artist studios. Brookland is known for high crime, 30 percent of residents living below the poverty line, and 51 percent of children living in poverty. This loan helped to revitalize and stabilize four out of the seven surrounding census tracts which are also low- and moderate-income areas. The project helped encourage additional investments to this underserved community so that the efforts in this and the surrounding neighborhoods continue.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 1,614 loans totaling nearly \$480 million in the AA. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	760	247,357
FHA	302	79,237
HARP	306	52,916
VA	220	95,517
SBA	5	560
USDA	21	4,387

INVESTMENT TEST

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

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

The bank 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. Investments represent 97.7 percent of tier 1 capital allocated to the AA. Bank operations commenced in the AA December 2018.

The bank exhibits excellent responsiveness to credit and community economic development needs, including affordable housing, community services, and economic and workforce development. Qualified investment allocations were 85.0 percent affordable housing, 5.5 percent community services, 5.0 percent economic and workforce development, and 4.5 percent revitalization/stabilization. Affordable housing investments created or retained 227 low- and moderate-income housing units for individuals and families. Twenty-nine grants totaling \$5.7 million were provided to a variety of organizations primarily supporting community services, economic development, and revitalization/stabilization.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Five complex investments totaled \$28.8 million and included one Direct Investor LIHTC transaction and one innovative investment structure. The LIHTC transaction requires bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. An \$1.5 million grant was a catalyst for future growth and other improvements under a local government plan.

Number and Amount of Qualified Investments

Qualified Investments - Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
DC MMSA	0	0	31	33,838	31	22.5	33,838	17.0	0	0
Other:										
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	31	25,933	37	128,580	68	49.3	154,513	77.6	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	26	9,531	13	1,255	39	28.2	10,786	5.4	0	0

Examples of CD Investments in AA include:

- In June 2019, the bank provided a \$1.0 million grant (first installment of \$3.3 million) to a CDFI based in Arlington VA for its program in the Washington DC Metro Region. Funding will be used to implement a program targeting diverse low- and moderate-income entrepreneurs with revenues of

\$1 million or less in Washington DC area and the nearby suburbs in Maryland and Virginia. The program is a partnership between three CDFIs. The three-year program will provide loan capital to entrepreneurs with a focus on the footprint of participating CDFIs.

- In April 2019, the bank invested \$10.0 million in 501(c)(3) bonds used to finance a portion of cost acquisition and improvement of mixed-income affordable workforce housing rental projects by non-profit entities in the Washington DC region. The subject property is a qualified low-income building. Fifty-one percent of capital commitments were allocated for affordable housing projects where at least 51.0 percent of residential units are reserved for households earning less than 80 percent AMI. Households meeting this requirement will pay rents that are no more than 30 percent of 80 percent AMI. Local non-profit developers in the DC region viewed the investment structure as an innovative solution to a housing affordability requirement that is typically only extended for 15 years.
- In December 2018, the bank provided an \$18.1 million Low Income Housing Tax Credit (LIHTC) investment for a new construction family property located in Triangle, VA. The project consists of 227 LIHTC units restricted at 60.0 percent AMI. A nonprofit community development corporation that serves the needs of low-income individuals and families is the developer and will also provide resident services to the tenants.

Statewide Investments in Maryland

The bank has 107 current and prior period investments totaling \$165.2 million with and without a P/M/F to serve AAs in the state of Maryland. These CD investments primarily support affordable housing and community services, with revitalization/stabilization and economic development to a lesser extent. Qualified investments in the broader statewide or regional area represent 83.0 percent of total qualified investments in and surrounding the Washington-Baltimore-Arlington broader regional area. The bank was investing in this broader area before its official CRA entry into the market with the opening of branch locations. These investments support the bank's overall excellent performance in the DC MMSA.

SERVICE TEST

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

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution respectively exceeds and is near to the percentage of the population. The bank had four branches in the low-income geographies and five

branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that served moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branch and confirmed it serves the adjacent moderate-income population.

Distribution of Branch Delivery System								As of December 31, 2019			
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	30	100	13.3	16.7	16.7	53.3	10.9	20.9	33.9	33.8

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

Alternative delivery systems had a neutral effect on the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the 149 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank had 13 (8.7 percent) deposit-taking ATMs in low-income geographies and 28 (18.8 percent) ATMs in moderate-income geographies. This is a new rating area and bank-provided data demonstrates customer adoption of online, mobile, and telephone banking delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
DC MMSA	30	0	+4	+5	+5	+16

The bank's opening of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank entered this AA in 2019, closing no branches and opening 30 branches, four of which are in low-income geographies and five are in moderate-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs. The level and responsiveness of CD services positively affected the service test performance.

Bank records show that employees provided technical assistance and/or job-specific expertise for 573 CD service activities to 35 organizations for a total of 3,580 qualified hours of service within the AA, including 178 hours of board service over 16 months. Much of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The activities were responsive to AA needs, particularly affordable housing. The following are examples of CD services provided in the AA:

- A bank employee provided 40 hours of board service to a community development organization that provides private financing for affordable housing and neighborhood revitalization.
- Five bank employees provided 230 hours of technical expertise to a non-profit organization that provides low-cost, short-term financing to non-profits, for-profits, and government entities engaged in developing affordable housing for low-income individuals.
- Four bank employees provided 600 hours of technical assistance to a nonprofit community development fund that provides capital financing to low- and moderate-income entrepreneurs.

Multistate Metropolitan Statistical Area Rating

Portland-Vancouver-Salem, Oregon-Washington CSA (Portland CSA)

CRA rating for the Portland CSA⁵: 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:

- An excellent level of lending activity.
- An excellent geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in CD lending, which significantly positively affected the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified CD investments that displayed excellent responsiveness to community economic development needs.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Portland CSA

The Portland CSA is Chase's 15th largest rating area based on its total deposits of \$7.0 billion, representing 0.5 percent of the bank's total deposits. As of December 31, 2019, the bank operated 92 branches and 160 ATMs in the rating area, representing 1.8 percent of total branches and 0.9 percent of total ATMs. The bank originated and purchased approximately \$10.6 billion in loans or 1.5 percent of total bank loan originations and purchases during the evaluation period in the CSA.

According to FDIC Deposit Market Share data as of June 30, 2019, there were 36 banks operating 635 branches in the rating area. Chase ranked fourth with deposit market share of 11.4 percent. The top three banks and their deposit market share were U.S. Bank, N.A. (21 percent), Bank of America, N.A. (17.6 percent), and Wells Fargo Bank, N.A. with 16.3 percent.

Chase's AA consists of geographies in the states of Oregon and Washington. Refer to appendix A for a complete listing of the counties included in the AA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Portland CSA. Table A indicates that approximately 21.4 percent of families in the AA are low-income. The Portland CSA's cost of housing generally makes homeownership difficult for many LMI borrowers. The median housing value across the Portland CSA ranges from three to five

⁵This 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.

times the median income, three times the moderate-income, and approximately four times the low-income, indicating OOU's are not affordable to some moderate- and most low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Portland CSA, assuming a 30-year mortgage with a 5 percent interest rate, 3.0 percent down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,074 per year (or less than 50 percent of the FFIEC adjusted median family income in the MMSA) could afford a \$152,897 mortgage with a payment of \$962 per month; a moderate-income borrower earning \$51,318 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$244,647 mortgage with a payment of \$1,540 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	619	3.2	23.7	45.6	26.8	0.6
Population by Geography	3,017,407	2.7	24.7	45.9	26.5	0.2
Housing Units by Geography	1,217,933	2.6	24.2	45.7	27.2	0.3
Owner-Occupied Units by Geography	696,189	1.2	18.3	49.0	31.5	0.0
Occupied Rental Units by Geography	447,236	4.8	33.1	40.3	21.2	0.6
Vacant Units by Geography	74,508	3.1	26.5	46.7	23.3	0.4
Businesses by Geography	296,166	3.1	21.9	41.0	32.1	1.9
Farms by Geography	10,709	1.9	14.0	55.2	28.4	0.4
Family Distribution by Income Level	736,255	21.4	17.5	20.4	40.6	0.0
Household Distribution by Income Level	1,143,425	24.0	16.2	18.1	41.6	0.0
Median Family Income MSA - 10540 Albany-Lebanon, OR MSA		\$54,713	Median Housing Value			\$264,137
Median Family Income MSA - 18700 Corvallis, OR MSA		\$76,967	Median Gross Rent			\$973
Median Family Income MSA - 31020 Longview, WA MSA		\$57,938	Families Below Poverty Level			10.1%
Median Family Income MSA - 38900 Portland-Vancouver- Hillsboro, OR-WA MSA		\$73,089				
Median Family Income MSA - 41420 Salem, OR MSA		\$58,033				
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics November 2019 report, the economy in the Portland region is improving. Job growth has picked up and the jobless rate is near a three-decade low which is pressuring employers to raise wages. The area has a diversified economy; highly educated and skilled workforce; and above average incomes. Employment in professional, scientific, and technical services is growing, driven by an active start-up culture and expansion at existing firms. Major employment industries include business and professional services; education and health services; and government. Major employers in the area include Intel, Providence Health Systems, Oregon Health and Science University, Legacy Health System, and Nike. Higher pay and lower mortgage rates are bolstering residential real estate. Home sales are at a one-year high and housing starts have picked up recently, with gains in single- and multifamily building.

Community Contacts

Four community contacts and community needs assessments completed during the examination period were reviewed. The organizations contacted focused on areas including affordable housing, small business assistance, community services, and community and non-profit support. Contacts noted that there is insufficient affordable housing in the region due in part to a construction industry that does not have the capacity to meet the housing demand. Contacts also noted that many employers have difficulty finding qualified workers with the needed education and experience to fill vacant job positions. Workforce development programs are needed to assist low-income individuals in developing the skills necessary to access higher paying jobs. Other identified needs in the area include:

- Down payment assistance programs for first time homebuyers
- Small business loans for start-ups and recently established businesses
- Increase the supply of affordable housing

Scope of Evaluation in Portland-Vancouver-Salem, OR-WA CSA

The Portland CSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PORTLAND CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 32.9 percent and 65.8 percent of the loan volume in the MMSA by number and 86.4 percent and 8.5

percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 1.0 percent of the loan volume in the MMSA by number and 0.09 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Portland CSA	25,878	51,757	841	178	78,654

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Portland CSA	9,145,893	898,337	9,749	527,275	10,581,254

As of June 30, 2019, Chase ranked fourth in deposits out of 36 institutions with 11.4 percent market share.

In overall home mortgage lending, Chase ranked fourth with 3.8 percent market share. The top three lenders in the market are Wells Fargo Bank, N.A. (6.8 percent), U.S. Bank, N.A. (5.1 percent), OnPoint Service Group, LLC (4.1 percent), and Umpqua Bank (3.7 percent).

In small loans to businesses, Chase ranked first out of 156 lenders with a 16.8 percent market share. Other major lenders are U.S. Bank, N.A. (16.1 percent), American Express National Bank (12.3 percent), and Bank of America, N.A. (10.9 percent).

In small loans to farms, Chase ranked second out of 29 lenders with a 17.5 percent market share. The other major lenders in the market are U.S. Bank, N.A. (24.3 percent), Wells Fargo Bank, N.A. (14.9 percent), Columbia State Bank (11.6 percent), and John Deere Financial, F.S.B (10.3 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 Multi State Portland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans in LMI areas exceeded the percentage of owner-occupied units and was near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies exceeded the percentage of owner-occupied units and the aggregate distribution of loans, while performance in moderate-income geographies was near to the percentage of owner-occupied units and the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (3.1 percent) and competition between 156 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies and against the aggregate distribution of all lenders was given slightly more consideration.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and exceeded the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to the proportion of businesses and met the aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State Portland 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (2.6 percent) constrained lending opportunities and that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies met the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans in moderate-income geographies was well below the proportion of farms in those geographies and met the aggregate distribution of all lenders.
- During the 2014 to 2016 period, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Portland section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above under the Description of this Full-Scope AA, particularly, the cost of housing and level of poverty in portions of the MMSA. Higher consideration was given to performance against the aggregate of all lenders.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and met the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to the aggregate distribution of loans by all lenders.
- During 2014 to 2016, the proportion of loans to low-income borrowers was well below the percentage of low-income families and met the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is excellent. The following information was taken into consideration when determining this rating.

- Slightly greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

- During 2014 to 2016, the percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the Multi State Portland 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.

Community Development Lending

The bank is a leader in CD lending which had a significantly positive affect on the overall Lending Test rating.

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

There were 178 CD loans made for a total of \$527.3 million. This represents 58.3 percent of the tier 1 capital allocated to the AA. The majority (or 98.6 percent) of CD loans were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In May 2014, Chase originated a \$7.4 million loan to develop a 124-unit mixed income housing project in Salem, OR. The housing project is divided into two parcels. The bank's financing was used to develop 108 housing units in one of the parcels, which includes 62 one-bedroom units restricted to seniors aged 55 and older and the remaining units restricted to individuals and families with incomes up to 50 percent of the AMI.
- In June 2015, Chase provided a \$29.4 million loan to acquire and renovate an existing 301-unit apartment building in the Portland area. Ninety-five percent of the units were for low- and moderate-income seniors with incomes that are 60.0 percent or less of the AMI. The loan helped to preserve affordable housing units for seniors and the building has an on-staff service coordinator to assist residents in networking with community-based services.

- In March 2019, Chase provided a \$22.4 million construction loan for new affordable housing units in Portland, OR and Hermiston, OR. A total of 207 affordable units will be created for families with incomes of 60 percent or less of the AMI. The property managers will provide tenants with housing-related services (eviction prevention, lease compliance, issue resolution) and other community services (learning and recreation).

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 4,679 loans totaling nearly \$964.6 million in the AA. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	663	178,523
FHA	762	156,301
HARP	1,124	168,801
VA	534	146,962
SBA	176	35,143
USDA	1,420	278,826

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investments and grants, but rarely in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 13.9 percent of tier 1 capital allocated to the AA. A significant majority, or 79.5 percent, were current period investments. Leadership was displayed with two current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. All current and prior period investments are considered responsive to credit and community economic development needs such as affordable housing, community service, economic development, and revitalizing/stabilization efforts. Ninety-eight percent of the dollar amount of current period CD investments support affordable housing, which is an identified need. A total of 4,437 housing units for low- and moderate-income individuals were created or retained. Additionally, the bank made 41 grants totaling \$2.1 million, of which \$1.7 million or 79.7 percent supported community service. One and two grants supported revitalization/stabilization and economic development, respectively. All prior period CD investments are LIHTC-related investments that support affordable housing.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. Of 115 total qualified investments, 26.3 percent of the total dollar amount were complex. Six current period investments are considered complex as they are mainly related to Direct Investment LIHTC transactions and NMTC financings. Additionally, five prior period investments are considered complex as they are related to Direct Investment LIHTC transactions. Three CD investments or 1.7 percent of the total

dollar amount of total qualified investments are considered catalyst investments that will encourage future job growth, area improvements and community revitalization.

Qualified Investments - Portland-Vancouver-Salem, Oregon-Washington CSA										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Portland- CSA	46	25,910	69	100,225	115	100.00	126,135	100.00	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.

Examples of CD Investments in the AA include:

- The bank provided a \$1.6 million NMTC investment for the renovation of a historic post office building in Portland, now part of the Pacific Northwest College of Art. The additional space was needed to continue growing the overall student enrollment. The major program elements included instructional spaces, classrooms, studies, laboratories, and supporting administrative and faculty spaces. The project created 40-50 new jobs and approximately 70 construction jobs, 15 percent of which will be filled by low-income persons.
- The bank provided a \$14 million LIHTC investment which contributed to the creation of 127 affordable housing units.
- The bank invested \$1.1 million in a LIHTC Fund, of which the bank had a \$45 million share of the \$271 million total fund. The fund will create opportunities for low- and moderate-income people through affordable housing in diverse communities. This investment contributed to the creation of 215 affordable housing units.

SERVICE TEST

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

Based on a full-scope review, including the data in the tables below, the bank's performance in the Portland CSA is excellent.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution exceeds the percentage of the population. The bank had three branches in low-income geographies and 26 branches in moderate-income geographies. The distribution was augmented by three MUI tract branches that serve low-income tracts and 27 MUI

tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Portland-Vancouver-Salem, OR-WA CSA	100	92	100	3.3	28.3	41.3	26.1	2.7	24.7	45.9	26.5

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

Alternative delivery systems generally enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 160 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank did not increase the deposit-taking ATMs. In low- and moderate-income geographies, the bank had 6 (3.68 percent) deposit-taking ATMs in low-income geographies and 42 (26.3 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed nominal change in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Portland-Vancouver-Salem, OR-WA CSA	0	6	-1	-1	-3	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open any branches in low- and moderate-income geographies and closed one branch each in low- and moderate-income geographies. Branch closures were due to reduced customer usage. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs. The CD services positively affected the service test performance.

Bank records show employees provided technical assistance and/or job-specific expertise for 400 CD service activities to six organizations for over 2,100 qualified hours of service, including 611 hours of board service. Much of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families that were responsive to the identified need for affordable housing. The following are examples of CD services provided in this AA:

- Two bank employees provided 239 hours of Board service to community organizations that provide affordable housing to low- and moderate-income families.
- A bank employee provided 372 hours of Board service to a community organization that provides homebuyer education, foreclosure prevention programs, training and education in personal finance management, and self-employment.

Multistate Metropolitan Statistical Area Rating

Louisville/Jefferson County-Elizabethtown-Madison, KY-IN CSA (Louisville CSA)

CRA rating for the Louisville CSA⁶: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- An overall adequate geographic distribution of home mortgage loans and small loans to businesses.
- An overall good borrower distribution of home mortgage loans and small loans to businesses.
- No CD loans were made, which has a negative effect on the Lending Test rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified CD investments and grants that displayed excellent responsiveness to credit and community economic development needs.
- The use of innovative and/or complex qualified investments.
- Retail service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.
- A relatively high level of CD services that were responsive to AA needs.

Description of Institution's Operations in Louisville CSA

The Louisville CSA is Chase's 17th largest rating area based on its total deposits of \$4.5 billion, representing 0.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 35 branches and 79 ATMs in the rating area, representing 0.70 percent of the bank's branches and 0.5 percent of the bank's deposit-taking ATMs. The bank originated and purchased approximately \$1.9 billion in loans or 0.3 percent of total bank loan originations and purchases during the evaluation period in the CSA.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 40 banks operating 374 branches in the AA. Chase ranked second in deposit market share with 16 percent. Major competitors and their deposit market share are PNC Bank, N.A. (23.7 percent), Fifth Third Bank (10 percent), and Republic Bank and Trust (9.8 percent).

Chase has delineated the entire Louisville CSA as its AA. Refer to appendix A for a complete listing of counties that comprise the MMSA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Louisville CSA. Table A indicates that approximately 21.0 percent of families in the

⁶This 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.

AA are low-income. The Louisville CSA's cost of housing generally makes homeownership affordable for most moderate-income and some low-income borrowers. The median housing value in the Louisville CSA ranges from two to three times the median income, over three times the moderate-income, and five times the low-income, indicating a proportion of OOUs are not affordable to some low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Louisville CSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 percent down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,636 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$141,228 mortgage with a payment of \$889 per month; a moderate-income borrower earning \$47,418 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$226,057 mortgage with a payment of \$1,423 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Louisville CSA 2107-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	288	12.2	20.5	37.5	28.8	1.0
Population by Geography	1,198,976	8.7	17.3	42.3	31.3	0.4
Housing Units by Geography	520,915	9.3	18.7	42.1	29.5	0.4
Owner-Occupied Units by Geography	306,543	4.2	13.9	44.7	37.2	0.1
Occupied Rental Units by Geography	163,008	16.4	26.1	38.4	18.2	0.8
Vacant Units by Geography	51,364	17.7	23.8	38.2	19.2	1.1
Businesses by Geography	90,139	7.1	14.8	35.0	39.5	3.5
Farms by Geography	2,734	2.8	9.2	48.3	39.2	0.4
Family Distribution by Income Level	299,723	21.0	17.3	19.9	41.8	0.0
Household Distribution by Income Level	469,551	24.6	15.7	17.6	42.1	0.0
Median Family Income MSA - 21060 Elizabethtown-Fort Knox, KY MSA		\$59,273	Median Housing Value			\$159,758
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,965	Median Gross Rent			\$753
			Families Below Poverty Level			10.7%

*Source: 2015 ACS and 2019 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.*

Economic Data

According to the December 2019 Moody's Analytics report, the area economy is slow with nominal growth. The area has a below average per capita income and below-average educational attainment. The economy is primarily driven by transportation manufacturing with a high demand for locally produced trucks and SUVs than for cars. The declining labor market was attributed to the downward trend in job growth from mid-2018 to mid-2019. This revealed that the metro area barely added any new jobs with a substantial drop likely for the large manufacturing industry. In 2019, the unemployment

rate changed slightly, partially due to the weak labor market growth. Other economic drivers for the area are Logistics and Insurance. UPS and Amazon have a commanding presence in the area. UPS recently announced plans to invest \$750 million in the area and create approximately 1,000 positions over the next decade at a new facility. The area logistic positions will provide above average wages resulting in a boost to the economy with anticipated consumer spending. Further the area remains a strategic location for logistic firms given nearly half of the US population lives within reasonable distance. A top insurance employer in the area is Humana. In 2020, job growth is expected to pick up supported by an evolving composition of the population in the area. The graying US population will give health insurance firms an uptick as the number of Americans in their peak healthcare spending age surges. Health insurance will have to adapt quickly to the needs of the patients all while addressing the health reform (i.e., Affordable Care Act) requirements along with assessments or fees. The top three employers in the area are: Fort Knox, Ford Motor Co., and Humana Inc. The area does have relatively low living costs and business costs which makes it a desirable locale. In terms of housing, sixty percent of homes are owned-occupied.

Community Contacts

A review was conducted of five community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on several areas including affordable housing, community development fund, entrepreneurial start-ups, economic and workforce development. Contacts noted concerns with business and home mortgage financing in low- and moderate-income areas as evidenced by large numbers of state and local government redevelopment. Contacts noted that community banks now constitute the bulk of financing investors as decisions at large banks are made out-of-town and makes them less responsive to local needs. Contacts noted that the surrounding counties continue to improve but there is a close watch due to recent layoffs by plant facilities. The housing market is tight because of the availability of land. The redevelopment of areas has caused an increase in prices ultimately pushing out predominantly low- and moderate-income and African American populations. The contacts identified the following needs in the area:

- Affordable housing and affordable rental housing
- Down payment assistance
- Financing for small business development to assist in revitalization strategy
- Financial literacy
- Neighborhood and environmental revitalization programs
- Economic and workforce development
- Financing for start-up businesses
- Financing for economically challenged individuals relative to business and home mortgage lending

Scope of Evaluation in Louisville CSA

Examiners performed a full-scope review of the Louisville.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LOUISVILLE CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to credit needs in the AA.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 33.5 percent and 65.6 percent of the loan volume in the CSA by number and 78.1 and 21.8 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.9 percent of the loan volume in the CSA by number and 0.1 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville CSA	8,341	16,366	212	0	24,919

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Louisville CSA	1,484,280	413,723	2,227	0	1,900,230

As of June 30, 2019, Chase ranked second in deposits out of 40 institutions with 15.9 percent market share.

In overall home mortgage lending, Chase ranked sixth out of 457 lenders with 3.6 percent market share. This is a competitive market. The top three lenders in the market are PNC Bank, N.A. (5.4 percent), Republic Bank & Trust Co. (5.1 percent), and Wells Fargo Bank, N.A. (4.7 percent).

In small loans to businesses, Chase ranked first out of 116 lenders with 17.5 percent market share. Other major lenders are American Express National Bank (16.8 percent), and PNC Bank, N.A. (12.9).

In small loans to farms, Chase ranked second out of 24 lenders with a 23.6 percent market share. The other major lender in the market is John Deere Financial, F.S.B with a 39.15 percent market share. Wells Fargo Bank, N.A. and U.S. Bank, N.A. are the next largest lenders, each holding 6.2 percent market share.

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 Multi State Louisville section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.2 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (457 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas were well below the percentage of owner-occupied units and below the aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and near to the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the overall geographic distribution of the bank's originations and purchases of small loans to businesses is adequate. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (7.1 percent) and competition between 116 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and well below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State Louisville 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is adequate. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (2.8 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. The bank made no loans to small farms in low-income geographies during the period. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Louisville section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above under the Description of this Full-Scope AA, particularly, the cost of housing and level of poverty in portions of the CSA.

- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and the aggregate distribution of loans by all lenders
- During 2014 to 2016, the bank's performance in lending to low-income borrowers was stronger than its performance between 2017 to 2019. The proportion of loans to low-income borrowers was below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the Multistate Louisville 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

Community Development Lending

The bank has made no CD loans in the AA during the evaluation period, which negatively affected the rating.

While the bank was unable to make any CD loans during the period, the bank continued to meet the needs of the low- and moderate-income individuals and geographies in Louisville CSA through qualified CD investments and service activities.

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

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, a total of 2,443 loans were funded totaling \$343.1 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	472	72,111
FHA	752	85,186
HARP	301	33,055
VA	387	69,143
SBA	75	21,412
USDA	456	62,159

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investment dollar volume represents 9.3 percent of tier 1 capital allocated to the AA. A significant majority or 84.5 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA, including affordable housing and affordable rental housing, economic and workforce development, community service, and revitalization/stabilization for low- and moderate-income individuals and geographies. Current period investments include 92.6 percent or \$42.3 million affordable housing and 7.3 percent or \$3.4 million community service. All prior period investments were allocated to affordable housing. Current and prior period affordable housing investments created 3,129 low- and moderate-income units for individual and families. The bank provided 27 grants or \$3.4 million to a variety of organizations that primarily support community service through economic and workforce development. In some occurrence's grants were provided in multiple years.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. Current and prior period complex investments represent 38.4 percent or \$20.8 million of total investments. They included Direct Investor LIHTC transactions with participations from federal and state governments, local housing agencies, and real estate developers. Direct LIHTC require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance.

Qualified Investments - Louisville/Jefferson County-Elizabethtown-Bardstown KY-IN CSA										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Louisville CSA	22	8,412	49	45,739	71	100	54,151	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 bank's financial

Examples of CD Investments in the AA include:

- In November 2014 and in April and December of 2019, the bank made \$1.3 million in grants to an organization that provides community service intended to provide technology skills to low-income individuals within the AA, with a focus on the six lowest-income neighborhoods. The goal of the project was to expand access to career pathways for low- and moderate-income individuals in those six Louisville neighborhoods. A total of 500 individuals were expected to enroll and participate in the program. The median income for individuals in the focus area was \$18 thousand per annum compared to \$31 thousand in the AA.
- In 2018 and 2019, the bank originated five grants totaling \$600,000 to a foundation project responsible for the Academies of Louisville/Workforce initiatives in Louisville KY. The Foundation provides low- and moderate-income youth who need a first work experience and have barriers to finding work, the opportunity to acquire the skills, resources, and networks needed to connect to employment opportunities leading to lifelong careers. Funding was expected to support the initiatives and to launch the new Summer Youth Tech Program in Louisville KY. The Foundation will prepare, inspire, and empower students by offering meaningful and relevant learning experiences through career pathways connected to core academic subjects. All students are low- and moderate-income with 6.0 percent identified as homeless. Academic experiences include career exploration field trips, job shadows, internships/co-ops, and solving real-world challenges through project-based learning.
- In December 2019, the bank made a \$7 million investment to a community development project for affordable housing in this AA. Plans were to renovate the homes in the apartment complex and use as affordable independent living units for people aged 62 or older, with 51 low- and moderate-income units available.
- From June 2016 through July 2018, the bank made three investments totaling \$1.6 million towards providing affordable housing through various LIHTC funds. Participation purchases represented 272 low- and moderate-income affordable housing units and exhibited the bank's responsiveness to community needs.

SERVICE TEST

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

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

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution respectively exceeds and is well below the percentage of the population. The bank had three branches in low-income geographies and two branches in moderate-income geographies. The distribution was augmented by eight MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Louisville/Jefferson County-Elizabethtown-Madison, KY-IN	100.0	35	100.0	8.6	5.7	45.7	37.1	8.7	17.3	42.3	31.3

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

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 79 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank did not increase the deposit-taking ATMs in low- and moderate-income geographies during the evaluation period. The bank had 14 (17.7 percent) deposit-taking ATMs in low-income geographies and five (6.3 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed nominal change in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Louisville/Jefferson County- Elizabethtown-Madison, KY-IN	0	10	-3	-1	-5	-1

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open any branches in low- and moderate-income geographies and closed three branches in low-income and one branch in moderate-income geographies. Branch closures were due to reduced customer usage and proximity to other Chase branches. Despite the branch closures, branch locations generally remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, 9:00 am to 6:00 pm on Friday and 9:00 am to 12:00 pm or 1:00 pm on Saturdays. Branches also have drive-up hours Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 12:00 pm or 1:00 pm. All retail banking services are available within the low- and moderate-income branches.

Community Development Services

The bank provides a relatively high level of CD services.

Review of bank records show that employees provided financial or job-specific expertise and/or technical assistance for 399 qualified CD service activities to 22 organizations since the last evaluation, for a total of 1,674 hours over a six-year period. All the bank's assistance was to organizations that provide services to low- and moderate-income individuals and families. The bank's CD services were responsive to the identified needs in the AA, particularly affordable housing, and financial literacy. The following are examples of CD services provided:

- Three bank employees provided homebuyer education over five years benefitting 391 low- and moderate-income customers.
- Forty-two bank employees provided financial literacy assistance over four years to low- and moderate-income participants of a national nonprofit whose program teaches K-12 students the basic concepts of financial literacy as it relates to everyday economics, and how they apply this information into adulthood.

Multistate Metropolitan Statistical Area Rating

Cincinnati-Wilmington-Maysville, OH-KY MMSA (Cincinnati MMSA)

CRA rating for the Cincinnati MMSA⁷: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- A good level of lending activity.
- A good geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD lending, which positively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified CD investments that displayed excellent responsiveness to credit and community economic development needs.
- Significant use of complex qualified investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in the Cincinnati MMSA

The Cincinnati MMSA is Chase's 22nd largest rating area based on its total deposits of \$2.5 billion, representing 0.2 percent of the bank's total deposits. As of December 31, 2019, the bank operated 35 branches and 69 ATMs in the rating area, representing 0.70 percent of total bank branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$1.9 billion in loans or 0.3 percent of total bank loan originations and purchases during the evaluation period in the MMSA.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 62 financial institutions operating 699 offices in the AA. Chase ranked sixth with deposit market share of 1.8 percent. The top three banks and their deposit market share include U.S. Bank, N.A. (52.4 percent), Fifth Third Bank (26.5 percent), and PNC Bank, N.A. (5.3 percent).

Chase's AA consists of geographies within Ohio and Kentucky. Refer to appendix A for a complete listing of counties included in the AA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Cincinnati MMSA. Table A indicates that approximately 21.9 percent of families in

⁷This 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 AA are low-income. The Cincinnati MMSA's cost of housing generally makes homeownership affordable for many LMI borrowers. The median housing value in the Cincinnati MMSA is approximately two times the median income, three times the moderate-income, and approximately four times the low-income, indicating OOU's are not affordable to some low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Cincinnati MMSA, assuming a 30-year mortgage with a 5 percent interest rate, 3.0 percent down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,975 per year (or less than 50 percent of the FFIEC adjusted median family income in the MMSA) could afford a \$166,740 mortgage with a payment of \$1,049 per month; a moderate-income borrower earning \$55,959 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$266,726 mortgage with a payment of \$1,679 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 178 Cincinnati-Wilmington-Maysville OH-KY MMSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	463	13.6	21.0	36.7	26.8	1.9
Population by Geography	1,976,032	8.7	17.7	39.0	33.4	1.3
Housing Units by Geography	847,321	10.7	19.1	39.3	30.3	0.5
Owner-Occupied Units by Geography	500,413	4.2	14.3	42.3	39.2	0.1
Occupied Rental Units by Geography	261,527	18.9	26.9	35.4	17.7	1.1
Vacant Units by Geography	85,381	23.8	23.6	34.1	17.2	1.3
Businesses by Geography	131,182	7.0	17.7	35.7	38.6	1.0
Farms by Geography	3,686	3.6	12.8	48.6	34.9	0.2
Family Distribution by Income Level	495,929	21.9	16.4	19.8	42.0	0.0
Household Distribution by Income Level	761,940	25.2	15.2	17.0	42.6	0.0
Median Family Income MSA - 17140 Cincinnati-Wilmington-Maysville OH- KY MMSA		\$69,949	Median Housing Value			\$158,731
			Median Gross Rent			\$768
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the February 2020 Moody's Analytics report, the area economy is strong. The area has a high per capita income and educated workforce. The area is a major center for manufacturing, healthcare, and financial services. The labor market is strong and the pace of employment growth in the area clocked in at its fastest since 1998. The unemployment rate has been in the mid 3 percent for the last quarters even as the labor force has continued to grow. More encouraging, Kroger, a major food chain, is expanding its digital headquarters and planned to add high e-commerce jobs by end of 2020. In

addition, healthcare investment has been spurred by a new \$600 million critical care center along with emergency facilities. Top three major employers include Cincinnati Children's Hospital Medical Center, Kroger Co., and Cincinnati/Northern Kentucky International Airport. The area has low living and business costs with affordable housing.

Community Contacts

A review was conducted of five community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on several areas including affordable housing, economic development, redevelopment of older homes, community services, and asset development and financial stability. Contacts noted concerns regarding housing affordability and access to affordable housing. Gentrification has driven prices up and pushed out low- to moderate-income residents that were living in the area prior to redevelopment. The contacts identified the following needs in the area:

- Neighborhood and environmental revitalization programs
- Affordable housing and affordable rental housing
- Loan programs to support the rehabilitation of older housing
- Purchase of Low-Income Housing Tax Credits
- Workforce development and job training programs to help individuals obtain living wage jobs
- Asset development for low- and moderate-income households
- Community services that address basic living needs
- Economic and workforce development
- Small business Education/Training/Technical Assistance

Scope of Evaluation in Cincinnati MMSA

Examiners performed a full-scope review of the Cincinnati MMSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CINCINNATI MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to credit needs in the AA.

Examiners considered the number and dollar amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.3 percent and 68.1 percent of the loan volume in the MMSA by number and 79.7 and 18.8 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal

weight in reaching conclusions. Farm loans represented 0.4 percent of the loan volume in the MMSA by number and 0.05 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati MMSA	8,417	18,305	118	16	26,856
Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Cincinnati MMSA	1,532,957	360,655	1,102	28,661	1,923,375

As of June 30, 2019, Chase ranked sixth in deposits out of 62 institutions with 1.8 percent market share.

In overall home mortgage lending, Chase ranked eleventh with 3.6 percent market share. The top three lenders in the market are U.S. Bank, N.A. (6.0 percent), The Huntington National Bank (6.0 percent), Union Savings Bank (5.3 percent), and Wells Fargo Bank, N.A. (4.6 percent).

In small loans to businesses, Chase ranked third out of 126 lenders with a 11.4 percent market share. Other major lenders are American Express National Bank (20.0 percent), U.S. Bank, N.A. (14.3 percent), and PNC Bank, N.A. (10.4 percent).

In small loans to farms, Chase ranked third out of 19 lenders with a 13.2 percent market share. The other major lenders in the market are U.S. Bank, N.A. (29.5 percent), John Deere Financial, F.S.B (18.9 percent), and The Huntington National Bank (10.6) market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.2 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA, with a number of major home mortgage lenders, was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- income areas were below the percentage of owner-occupied units and near to the aggregate distribution of loans. In moderate-income areas the proportion of loans was near to both the percentage of owner-occupied units and aggregate distribution of loans.

- During 2014 through 2016, performance in low-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and near to the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The smaller proportion of businesses in low-income geographies (7.0 percent) and competition between 126 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State Cincinnati 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (2.6 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.

- Between 2017 and 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders.
- During the 2014 to 2016 period, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Cincinnati section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above under the Description of this Full-Scope AA, particularly, the cost of housing and level of poverty in portions of the MMSA. Higher consideration was given to performance against the aggregate of all lenders.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and the aggregate distribution of loans by all lenders.
- During 2014 to 2016, the bank's performance in lending to low-income borrowers was stronger than its performance between 2017 to 2019. The proportion of loans to low-income borrowers was below the percentage of low-income families and met the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Slightly greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the Multi State Cincinnati 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was well below the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.

Community Development Lending

The bank 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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

There were 16 CD loans made for a total of \$28.7 million. This represents 9.0 percent of the tier 1 capital allocated to the AA. Nine (25.8 percent) of the CD loans are for revitalization or stabilization purposes, which is a critical need in this AA. Sixty percent supported affordable housing and 14.2 percent supported community services.

Examples of CD loans in the AA include:

- In June 2017, the bank originated a \$339,300 loan to rehabilitate and construct 12 historic buildings in a low-income area of the Over-The-Rhine neighborhood. The project met the city's Comprehensive Plan to revitalize the low- and moderate-income area and included eight mixed-use apartment buildings, commercial space, and a social enterprise restaurant that provides job training and placement for positions targeting low-income individuals and residents in this severely distressed community.
- Chase originated a \$7.1 million construction loan for bonds that were issued by the Ohio Housing Finance Agency. The purpose was to provide financing for the full rehabilitation of a low-income housing project in Cincinnati. The project contained 50 units on 8 sites with all units under 60 percent AMI. Ten of the units were specifically reserved for individuals with special needs.
- Chase originated a \$9.4 million loan to finance a 44-unit Low Income Housing Tax Credit (LIHTC) housing project in Cincinnati. The project is an affordable housing community designed for low-income single parents. The project's rent restrictions were up to 60.0 percent Area Median Income (AMI) with the project's operations supported by a 20-year project-based Housing Assistance Payment (HAP) contract used to provide Section 8 tenant-based assistance on all 44 units.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As show in the table below, the bank originated 2,652 loans totaling \$368.4 million in the AA. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	341	48,108
FHA	855	99,492
HARP	406	43,626
VA	295	51,365
SBA	41	24,336
USDA	714	101,483

INVESTMENT TEST

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

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

The bank has an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 52.3 percent of tier 1 capital allocated to the AA. A significant majority, or 74 percent of total investments represent current period investments. All prior period investments support a specific property in a LIHTC fund investment that supports affordable rental housing.

The bank exhibits excellent responsiveness to credit and community economic development needs, including affordable housing, community services, and revitalization/stabilization for low- and moderate-income individuals and geographies. CD investments of 70.1 percent and 24.7 percent focused on affordable housing and revitalization/stabilization, respectively, which are primary community development needs in the AA. Thirty grants totaled \$2.1 million with 82.9 percent supporting community services and 7.2 percent supporting affordable housing, respectively. All prior period investments support a specific property in a LIHTC fund investment that supports affordable rental housing.

The bank makes significant use of complex investments to support CD initiatives. Nine (29.4 percent) current period investments used NMTC financings which combines tax credit equity with other capital sources. They also serve as catalyst investments that encourage future growth and improvements in the area. Three other investments, overall total of 58.9 percent combined with complexity, serve as a catalyst for other community development activities for revitalization or stabilization that will encourage future growth and improvements in the area.

Qualified Investments- Cincinnati MMSA										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cincinnati MMSA	32	43,281	79	122,479	111	100	165,760	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.

Examples of CD Investments in the AA include:

- In March 2018, there was a \$1.3 million equity investment to a redevelopment foundation for the renovation and development of 20,313 square feet of commercial space to be located outside downtown Cincinnati, Ohio. It is estimated that the project will create 40 full-time construction jobs, 20 part-time permanent positions and 10 full-time permanent positions. The tenant will post vacancies with the Walnut Hills Job bank (operated by the Foundation), a workforce development initiative designed to connect residents in the area to jobs with special emphasis on career pathway jobs in the neighborhood. The project will also generate foot traffic in an underutilized Peebles Corner Historic District in the Walnut Hills Neighborhood. The investment was complex with the creation of a sub-Community Development Entity (CDE) to help finance the project and use of the NMTC that will encourage future growth and improvements in the area. The investment supports the community needs of economic development, neighborhood revitalization, job creations and workforce training
- In June 2017, the bank originated a \$8.3 million federal investment and a \$660,000 million state investment for a project that will preserve and revitalize twelve historic buildings. The buildings are in 13 low-income census tracts within Cincinnati, Ohio Over-The-Rhine neighborhood adjacent to the city's Findlay Market. The renovated buildings will be used to support small business ownership, plus job creation, training and placement for low-income persons and residents of the surrounding severely distressed low-income community. The specific project is supported by the city's plan to revitalize and stabilize The Over Rhine neighborhood. The plan outlines goals for mixed-use developments, enhance small business and microenterprise support programs. The investment supports the community needs of economic development, neighborhood revitalization,

and workforce training. The investments were responsive to revitalize a distressed and blighted neighborhood. The investments were complex with the use of the NMTC model which combines tax credit equity with other capital sources that serve as leverage to generate tax credit subsidies.

- In 2014 through 2018, six grants totally \$525,420 were provided to a non-profit organization for continued support of its financial center whose mission is to help willing and capable people living in poverty achieve economic self-sufficiency through employment. Financial services are integrated with employment services such that, as members become job ready, secure employment, and advance to higher page jobs over time, they are making sound financial decisions to build financial security. All the individuals served by the organizations are economically disadvantaged and financially needy. The investment was responsive by helping to serve the unemployed and the underemployed, and by providing financial education, job training and placement.

SERVICE TEST

The bank’s performance under the Service Test in the Cincinnati MMSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Cincinnati MMSA is excellent.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. The branch distribution in low-income geographies is below and in moderate-income geographies exceeds the percentage of the population in these respective geographies. The bank had two branches in the low-income geographies and eight branches in moderate-income geographies. The distribution was augmented by one MUI tract branch near low- and moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the adjacent MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Cincinnati MMSA	100	35	100	5.7	22.9	37.1	31.4	8.7	17.7	39.0	33.4

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 69 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 10.0 percent over the prior rating period to six (8.7 percent) deposit-taking ATMs in low-income geographies and 16 (23.2 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cincinnati MMSA	2	4	0	+1	-4	+1

The bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low-income geographies and opened one branch in a moderate-income geography and one branch in an upper-income geography. The bank closed four branches in middle-income geographies. The branch closures did not adversely impact the accessibility to retail banking services. Branch closures were due reduced customer usage and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. Branches also have drive-up hours of 8:30 am to 6:00 pm Monday through Friday and on Saturday 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank is a leader in providing CD services that are responsive to AA needs. CD services positively affected the service test performance in the MMSA.

Bank employees provided financial, job-specific expertise, or technical assistance for 389 CD service activities to 22 organizations, for a total of 1,424 hours during the evaluation period. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were responsive to the community needs in the AA, particularly affordable housing, and workforce development needs. The following are examples of CD services provided:

- Over the six-year evaluation period, three bank employees provided homebuyer education activities to 528 low- and moderate-income bank customers.
- For two years, seven bank employees provided technical assistance to a local nonprofit whose mission is to partner with all willing and capable people living in poverty, to assist them in developing job skills to become self-sufficient.

Multistate Metropolitan Statistical Area Rating

Wheeling, WV-OH MMSA (Wheeling MMSA)

CRA rating for the Wheeling, WV-OH MMSA⁸: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- A good level of lending activity.
- An overall good geographic distribution of home mortgage loans and small loans to businesses.
- An overall good borrower distribution of home mortgage loans and small loans to businesses.
- No CD loans were made, which has a negative effect on the Lending Test rating.
- The extensive use of innovative/flexible lending products, which positively affected the rating.
- An excellent level of qualified CD investments that displayed excellent responsiveness to credit and community economic development needs.
- Retail service delivery systems that are unreasonably inaccessible to geographies and individuals of different income levels in the bank's AA.
- A record of opening and closing branches that adversely affected the accessibility of delivery systems, particularly in moderate-income geographies.

Description of Institution's Operations in Wheeling MMSA

The Wheeling MMSA is Chase's 29th largest rating area based on deposits of \$198.3 million, representing less than one percent of the bank's total deposits. As of December 31, 2019, the bank operated two branches and three deposit-taking ATMs in the rating area. The bank originated and purchased approximately \$65.7 million in loans during the evaluation period in the MMSA.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 14 banks operating 59 branches in the MMSA. Chase ranked eighth in deposit market share with 5.2 percent. The top three banks and market share are WesBanco Bank, Inc. (36.3 percent), United Bank (10.7 percent), and Unified Bank (8.7 percent).

Chase has delineated the entire multistate Wheeling MMSA as its AA. Refer to appendix A for a complete listing of counties that comprise the MMSA.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Wheeling MMSA. Due to ACS and OMB boundary changes, there are no low-income census tracts in the MMSA during the 2017 to 2019 period.

⁸ 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 indicates that approximately 19.1 percent of families in the AA are low-income. The Wheeling MMSA's cost of housing generally makes homeownership affordable for most LMI borrowers. The median housing value in the Wheeling MMSA is approximately 1.7 times the median income, 2.1 times the moderate-income, and 3.4 times the low-income, indicating a large proportion of OOU's are affordable to low- and moderate-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Wheeling MMSA, assuming a 30-year mortgage with a 5 percent interest rate, 3.0 percent down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$28,426 per year (or less than 50 percent of the FFIEC adjusted median family income in the MMSA) could afford a \$135,508 mortgage with a payment of \$853 per month; a moderate-income borrower earning \$45,482 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$216,790 mortgage with a payment of \$1,364 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wheeling WV-OH MMSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	27.7	55.3	17.0	0.0
Population by Geography	145,677	0.0	15.0	65.4	19.6	0.0
Housing Units by Geography	69,172	0.0	17.0	66.0	17.0	0.0
Owner-Occupied Units by Geography	43,803	0.0	12.0	68.8	19.2	0.0
Occupied Rental Units by Geography	16,109	0.0	27.0	59.1	13.9	0.0
Vacant Units by Geography	9,260	0.0	23.2	64.8	12.0	0.0
Businesses by Geography	8,567	0.0	21.3	59.4	19.3	0.0
Farms by Geography	265	0.0	8.3	72.1	19.6	0.0
Family Distribution by Income Level	37,967	19.1	19.3	20.9	40.7	0.0
Household Distribution by Income Level	59,912	24.4	16.6	16.8	42.2	0.0
Median Family Income MMSA - 48540 Wheeling, WV-OH MMSA		\$56,853	Median Housing Value			\$98,597
			Median Gross Rent			\$558
			Families Below Poverty Level			9.3%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the November 2019 Moody's Analytics report, the area economy is weak. The area has a low per capita income and low educational attainment. The population is declining and rapidly aging. The area is a major center for natural resources (i.e., mining) and health care professional services, however, the labor market is weak. From mid-2018 to mid-2019 employment fell approximately one percent. Natural resources and construction, which propelled net hiring in 2018 is now shedding staff. Healthcare is struggling because of hospital closures. In 2019, health care jobs fell by five percent

following the closure of two local hospitals, one of which was a major employer of the area. As a result, the unemployment rate shot up by more than a full percentage point to 6.1 percent and is the highest in West Virginia. Experts noted that employment in the natural resources sector will taper off in 2019. The coal export business has been a major contributor for increased earnings in the area. However, the demand for the coal export business may not rise at a faster rate than to the amount of coal used in domestic electricity production, resulting in flat employment for the mining industry. The top three major employers include Wheeling Hospital Inc, Murray Energy, and Ohio Valley Medical Center, which closed in 2019. It is anticipated that the falling population will limit the demand on the housing market putting downward pressure on the house prices.

Community Contacts

A review was conducted of three community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on several areas including affordable housing, economic development, workforce development, community services, and asset development and financial stability. Contacts noted concerns regarding financing for affordable housing and volunteers for community service efforts. Contacts observed that there could be more opportunities for involvement with local financial institutions. Due to the demographic composite, diversity is limited in the community profile. Drug addiction is a growing concern in the area and as a result many grandparents are serving as the primary guardian to children in the area. The contacts identified the following needs in the area:

- Financing for low- to moderate-income housing
- Affordable housing and affordable rental housing
- Community services
- Neighborhood and environmental revitalization programs
- Homebuyer education and counseling programs for first time homebuyers
- Economic and Workforce Development

Scope of Evaluation in Wheeling MMSA

The Wheeling MMSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WHEELING, WV-OH MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the AA.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market

presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.2 percent and 67.5 percent of the loan volume in the MMSA by number and 64.1 and 35.4 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 1.2 percent of the loan volume in the state by number and 0.4 percent loan volume by dollar.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Wheeling MMSA	441	951	17	0	1,409

Dollar Volume of Loans (\$000's)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Wheeling MMSA	42,213	23,287	256	0	65,756

As of June 30, 2019, Chase ranked eighth in deposits out of 14 institutions with 5.2 percent market share.

In overall home mortgage lending, Chase ranked seventh out of 186 lenders with 3.1 percent market share. This is a competitive market. The top three lenders in the market are WesBanco Bank (14.1 percent), Huntington National Bank (8.6 percent), and Quicken Loans (6.5 percent)

In small loans to businesses, Chase ranked first out of 59 lenders with 15 percent market share. Other major lenders are Synchrony Bank (14.5 percent) and American Express National Bank (13.2 percent).

In small loans to farms, Chase ranked second out of 8 lenders with an 18.5 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (25.9 percent), Farmers National Bank (14.8 percent), Capital One, N.A. (11.1 percent), and U.S. Bank, N.A. (11.1 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The percentage of OOU in MI geographies dropped from 18.7 percent between 2014 and 2016 to 6.3 percent between 2017 and 2019. The additional challenge of high competition resulted in a poor proportion of loans to OOUs in moderate-income areas and poor performance against the aggregate.

- Between 2017 and 2019, the proportion of loans in moderate-income areas was well below both the percentage of owner-occupied units and the aggregate distribution of loans. There were no low-income geographies in the AA during this period.
- Stronger performance in low- and moderate-income geographies between the 2014 and 2016 time periods affected overall conclusions. The proportion of loans in low-income areas was well below the percentage of owner-occupied units but near to the aggregate distribution of loans. The proportion of loans in moderate-income areas exceeded both the percentage of owner-occupied units and the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of small loans to businesses in moderate-income geographies exceeded the proportion of businesses and was near to the aggregate distribution of all lenders.
- During 2014 to 2016, the bank's performance was weaker, particularly in low-income geographies, and negatively affected aggregated conclusions. The proportion of small loans to businesses in low-income geographies was below the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and aggregate distribution.

Small Loans to Farms

Refer to Table S in the Multi State Wheeling 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank made no small loans to farms in moderate-income geographies.
- During the 2014 to 2016 period, the bank made no small loans to farms in low- and moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Multi State Wheeling section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the competition and the economic constraints discussed above in the description of this full-scope AA.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was below the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank did not make any CD loans.

Wheeling MMSA is a very small market that receives one or two LIHTC allocations on average, annually. This market receives no LIHTC allocations in some years. While the bank was unable to make any CD loans during the period, the bank continued to meet the needs of the low- and moderate-income individuals and geographies in Wheeling MMSA through qualified CD investments and service activities.

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

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 249 loans totaling \$20.3 million in the AA. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	36	3,974
FHA	21	2,118
HARP	15	1,406
VA	12	1,890
SBA	3	222
USDA	162	10,707

INVESTMENT TEST

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

Based on a full-scope review, the bank's performance in the Wheeling MMSA is excellent. The bank has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investment dollar volume represents 11.2 percent of tier 1 capital allocated to the AA. A significant majority or 90.9 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA, which includes affordable housing for low- and moderate-income individuals and geographies. All current and prior period investments focused on affordable housing. The bank created or supported 189 low- and moderate-income housing units for individuals and families.

The bank does not use innovative and/or complex investments to support CD initiatives. However, all affordable housing investments were placed into LIHTC funds for the AA.

Qualified Investments – Wheeling MMSA										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Wheeling MMSA	3	259	4	2,589	7	100	2,848	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 bank's financial reporting system.

Examples of CD Investments in the AA include:

- From May 2014 through June 2016, the bank invested \$2 million in a LIHTC housing fund to provide 40 affordable rental units to low- and moderate-income individuals and families in the AA. Investments were in partnership with a nonprofit financial intermediary based in Columbus, Ohio.
- From December 2016 through July 2018, the bank invested \$600,000 in a LIHTC fund to provide 19 affordable rental units to low- and moderate-income individuals and families in the AA. Investments were in partnership with a nonprofit financial intermediary based in Columbus, Ohio.

SERVICE TEST

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

Based on a full-scope review, including the data in the tables below and performance context, the bank's performance in the Wheeling MMSA is poor.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the AA, particularly moderate-income geographies and/or moderate-income individuals.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems. As there are no low-income geographies, the analysis and discussion are based on performance in moderate-income geographies and to low- and moderate-individuals.

Based on the data in the table below and performance context, the branch distribution is poor. In moderate-income geographies, the distribution is well below the percentage of the population as there are no branches. The distribution was augmented by two MUI tract branches that serve the moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Wheeling MSA	100	2	100	0.0	0.0	50.0	50.0	0.0	15.0	65.4	19.6

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

Alternative delivery systems did not enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's three deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in moderate-income geographies. The bank did not increase ATMs in the AA during the evaluation period and had no ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed decreases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

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

The bank's closing of branches has significantly adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to moderate-income individuals. The bank closed its two branches in moderate-income geographies. Prior to the branch closures, the branch distribution in moderate-income geographies exceeded the percentage of the population in those geographies. Branch closures were due to reduced customer usage and unprofitability. The branch closures reduced the accessibility to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, vary in a way that significantly inconveniences the various portions of its AA, particularly moderate-income geographies and/or low-and moderate-income individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and on Saturday from 9:00 am to 2:00 pm. However, due to the branch closures, the availability of low-cost or no-cost cash withdrawal services were negatively affected.

Community Development Services

The bank provided an adequate level of CD services.

Bank records show that one employee provided technical assistance and/or job-specific expertise for 56 CD service activities to four organizations for a total of 65 qualified hours of service within the AA over a six-year period. Much of the bank's assistance was to organizations that provide community services

to low- and moderate-income individuals and families. The CD services provided were responsive to the identified need to homebuyer education. The following is an example of CD services provided in the AA:

- The bank employee provided 19 hours of homebuyer education to 36 moderate-income individuals on homeownership and the home loan approval process.

State Rating

State of Arizona

CRA rating for the State of Arizona⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- Adequate geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD loans, which positively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- A significant level of qualified investments that displayed excellent responsiveness to community development needs.
- The extensive use of complex investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels.
- A high level of CD services that are responsive to AA needs.

Description of Institution's Operations in Arizona

The state of Arizona is Chase's 7th largest rating area based on aggregate deposits of \$33.3 billion, representing 2.5 percent of the bank's total deposits. As of December 31, 2019, the bank operated 227 branches and 648 deposit-taking ATMs within the rating area, representing 4.7 percent of total branches and 3.9 percent of total ATMs. The bank originated and purchased approximately \$22.8 billion in loans or 3.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 68 banks operating 1,157 branches in the state of Arizona. Chase ranked first in deposit market share with 23.5 percent. Major competitors in the state based on deposit market share include Wells Fargo Bank N.A. (21.5 percent); Bank of America, N.A. (17.5 percent), and Western Alliance Bank (6.7 percent).

The bank delineated eight AAs in Arizona. The Phoenix-Mesa-Chandler MSA and Tucson MSA, which respectively account for 77.0 percent and 11.3 percent of the bank's deposits in Arizona, received full-scope reviews. The Flagstaff MSA, Lake Havasu City-Kingman MSA, Prescott Valley-Prescott MSA, Sierra Vista-Douglas MSA, Yuma MSA, and AZ Non-MSA AA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

Description of Full-Scope AAs

Phoenix-Mesa-Chandler, AZ MSA

⁹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographics that includes housing and business information for the Phoenix MSA AA. Table A indicates that the volume of OOUs is very small in low-income CTs and over 21.9 percent of families in the AA are low-income. The area's median housing value in the Phoenix MSA AA is three times the MSA median income, but four times the moderate- and more than six times low-income, indicating a limited proportion of OOUs are affordable to LMI. Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix-Mesa-Chandler AZ MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	991	11.1	23.3	32.9	31.4	1.3
Population by Geography	4,407,915	10.6	23.5	33.7	31.9	0.3
Housing Units by Geography	1,832,045	9.4	23.9	35.6	31.1	0.1
Owner-Occupied Units by Geography	967,478	4.5	19.6	37.1	38.7	0.0
Occupied Rental Units by Geography	602,639	16.7	29.7	32.6	20.8	0.2
Vacant Units by Geography	261,928	10.7	26.4	36.5	26.3	0.1
Businesses by Geography	439,910	6.1	16.3	30.0	47.1	0.5
Farms by Geography	8,508	5.9	19.4	32.2	42.2	0.3
Family Distribution by Income Level	1,036,417	21.9	17.3	19.5	41.3	0.0
Household Distribution by Income Level	1,570,117	23.4	16.5	17.9	42.2	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$197,320
			Median Gross Rent			\$991
			Families Below Poverty Level			12.5%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics November 2019 report, the strengths of the Phoenix-Mesa-Chandler, AZ MSA include robust population growth and in-migration; a hub for the relocation and expansion of financial and business services firms; and lower business costs than California. The large construction industry as well as undersize manufacturing and transportation and warehousing are propelling the economy, with each expanding headcount by more than 6.0 percent in the past year. The area remains a magnet for relocating residents and expanding businesses. There is ample demand to build new homes, healthcare facilities, stores, restaurants, offices, factories, and warehouses. Construction makes up an above-average 6.0 percent of total jobs. Major employment industries include professional and business services; education and health services; and government. The area is heavily reliant on finance jobs because its reasonable costs, large and fast-growing labor pool, and friendly business environment make it ideal for back-office and operations roles. Major employers in the area include Banner Health System; Walmart; Wells Fargo Bank, N.A.; and Arizona State University. Home price growth in the area has slowed in 2019 but is still faster than the nation. Some of the deceleration is due to a greater supply of single-family homes as housing starts accelerating.

Community Contacts

Examiners considered four community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on providing financing for affordable housing and economic development, and technical assistance to small businesses. Contacts noted that the area has a growing wealth gap. While there continues to be an influx of older and affluent individuals, many low-income residents struggle. There is a large population of young, Hispanic residents that is struggling and underserved. Housing costs in the city center are increasing and many low-income individuals must relocate to suburban areas and commute into Phoenix for work. According to the contacts, small businesses need access to smaller dollar loans for working capital purposes. Many smaller businesses utilize credit cards to meet short term smaller dollar amount credit needs. Also, non-profit organizations in the area need support to help expand their capacity.

Tucson, AZ MSA

The following table provides a summary of the demographics that includes housing and business information for the Tucson CSA AA. Table A below indicates that the volume of OOUs is very small in low-income CTs and over 39 percent of families in the AA are LMI. The area's median housing value in the Tucson CSA AA is three times the MSA median income, but over four times moderate-income, and more than six times low-income, indicating a limited proportion of OOUs are affordable to LMI. Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 536 Tucson-Nogales AZ CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	7.9	27.8	32.0	31.5	0.8
Population by Geography	998,537	9.1	27.1	31.2	32.1	0.5
Housing Units by Geography	446,769	8.8	27.1	31.6	32.4	0.1
Owner-Occupied Units by Geography	238,329	4.7	21.4	32.9	41.0	0.0
Occupied Rental Units by Geography	151,329	14.9	35.4	29.3	20.2	0.3
Vacant Units by Geography	57,111	10.0	28.4	32.1	29.4	0.1
Businesses by Geography	77,415	6.3	23.3	29.6	39.8	1.0
Farms by Geography	1,741	4.8	22.8	34.2	37.9	0.2
Family Distribution by Income Level	239,972	22.2	17.3	19.1	41.4	0.0
Household Distribution by Income Level	389,658	24.7	16.1	16.9	42.3	0.0
Median Family Income MSA - 46060 Tucson, AZ MSA		\$57,457	Median Housing Value			\$172,844
			Median Gross Rent			\$846
			Families Below Poverty Level			13.3%

Source: 2015 ACS and 2019 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.

Economic Data

According to Moody's Analytics November 2019 report, the Tucson area economy is expanding. The area has a highly educated workforce thanks to the presence of the University of Arizona. The area has significant healthcare and hospitality industries due to robust tourism and retirement inflows. The area also has strength in defense related aerospace manufacturing as it is the location of the headquarters and factory of Raytheon's Missile Systems Division. The aerospace industry has accounted for 12.0 percent of the net job creation in the Tucson area since 2015. Since aerospace roles in Arizona pay an average annual wage of more than \$100,000, spending by aerospace workers in the area boosts the construction, healthcare, hospitality, and retail industries. Raytheon plans to add 1,000 employees during the next couple of years. Major employment industries include government; education and health services; and professional and business services. Major employers in the area include the University of Arizona, Raytheon Missile Systems; Davis Monthan Airforce Base, Walmart, Inc., and U.S. Customs and Border Patrol. House price gains exceed those nationally, however, this is due in part to a lack of supply. In addition, single-family homebuilding is flat despite accelerating population growth.

Community Contacts

Examiners considered information from a Community contact completed during the examination period. The contact was with an organization focused on affordable housing and small business support and development. The contact noted that Hispanic small business owners are underserved and need assistance and support to gain access to mainstream banking services. The contact also noted that there is a need to bring equity to the community. Other needs identified in the community include affordable housing, fair wages, financial literacy, employee ownership, access to healthy food, and support for environmental sustainability initiatives.

Scope of Evaluation in Arizona

The Phoenix-Mesa-Chandler, AZ MSA and Tucson, AZ MSA received full-scope reviews. The two MSAs combined account for 88.3 percent of the deposits and 90.3 percent of lending in the state. The Phoenix-Mesa Chandler, AZ MSA received greater weight based on the volume of deposits and lending. The remaining six AAs received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating is discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

The bank's performance under the Lending Test in the state of Arizona is rated High Satisfactory.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Phoenix-Mesa-Chandler and Tucson-Nogales MSAs is good. Overall excellent lending levels and good borrower distribution of loans offset

weaker adequate geographic distribution. Product innovation and flexibility was considered favorably, and the relatively high level of CD lending positively affected the rating.

Lending Activity

Lending levels reflect an excellent responsiveness to the credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 38.4 percent and 61.1 percent of the loan volume in the state by number and 86.2 and 12.4 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.45 percent of the loan volume in the state by number and 0.05 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Phoenix-Mesa-Chandler MSA	61,239	99,860	628	27	161,754	78.0	77.0
Tucson MSA	10,479	14,887	77	9	25,452	12.3	11.3
Flagstaff MSA	1,186	2,212	15	0	3,413	1.6	1.0
Lake Havasu City-Kingman MSA	1,694	2,396	16	0	4,106	2.0	2.2
Prescott Valley-Prescott MSA	1,537	3,068	38	0	4,643	2.2	3.3
Sierra Vista-Douglas MSA	506	843	38	0	1,387	0.7	0.8
Yuma MSA	1,123	1,124	64	2	2,313	1.1	1.4
Arizona Non-MSA	1,926	2,412	62	0	4,400	2.1	3.0
Total	79,690	126,802	938	38	207,468	100.0	100.0

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

Dollar Volume of Loans (\$000's)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Phoenix-Mesa-Chandler MSA	15,355,222	2,144,240	8,655	226,836	17,734,953	80.3	77.0
Tucson MSA	2,126,317	327,989	874	52,911	2,508,091	11.4	11.3
Flagstaff MSA	377,690	47,471	417	0	425,578	1.9	1.0
Lake Havasu City-Kingman MSA	276,478	49,383	122	0	325,983	1.5	2.2
Prescott Valley-Prescott MSA	360,138	60,719	291	0	421,148	1.9	3.3
Sierra Vista-Douglas MSA	67,792	18,728	523	0	87,043	0.4	0.8
Yuma MSA	160,858	26,554	613	10,935	198,960	0.9	1.4
Arizona Non-MSA	313,406	67,066	883	0	381,355	1.7	3.0
Total	19,037,901	2,742,150	12,378	290,682	22,083,111	100.0	100.0

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

Phoenix-Mesa-Chandler, AZ MSA

Chase ranked first in deposits out of 63 institutions with 23.2 percent market share.

In overall home mortgage lending, Chase ranked second with 5.0 percent market share placing it in the top one percent of lenders. This is a very competitive market with 929 lenders and no single lender dominated the market. Other major home lenders with respective market shares are Wells Fargo Bank, N.A. (7.0 percent), U.S. Bank, N.A. (4.5 percent), and Quicken Loans (3.6 percent). The volume of loan originations made by non-banks to low- and moderate-income borrowers in Arizona increased by 22.0 percent between 2010 and 2018.

Chase ranked first in small loans to businesses with 20.9 percent market share. There were 208 lenders in the MSA. Other major lenders and market share are American Express National Bank (16.6 percent), Citibank, N.A. (14.4 percent), and Wells Fargo Bank, N.A. (10.5 percent).

Chase ranked first in small loans to farms with 33.5 percent market share. There were 30 lenders in the MSA. Other major lenders and market share are Wells Fargo Bank, N.A. (29.9 percent) and John Deere Financial, F.S.B. (10.9 percent).

Tucson, AZ MSA

Chase ranked second in deposits out of 20 institutions with 23.2 percent market share.

In overall home mortgage lending, Chase ranked fourth with 4.4 percent market share placing it in the top 1 percent of lenders. This is a very competitive market with 557 home mortgage lenders. The top three lenders and market share are Nova Financial (10.6 percent), Wells Fargo Bank, N.A. (8.0 percent), and Sunstreet Mortgage (4.9 percent). The volume of loan originations made by non-banks to low- and moderate-income borrowers in Arizona increased by 22.0 percent between 2010 and 2018.

In small loans to business, Chase ranked first with 18.7 percent market share. There were 110 lenders in the MSA. Other major lenders and their market share are Citibank, N.A. (15.1 percent), American Express National Bank (14.1 percent), and Wells Fargo Bank, N.A. (12.1 percent).

Chase ranked first in small loans to farms with 38.6 percent market share. There were 13 lenders in the MSA. Other major lenders and market share are Wells Fargo Bank, N.A. (30.1 percent), Capital One , N.A. (9.9 percent), and U.S. Bank, N.A. (7.23 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is adequate. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.5 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (930 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income geographies was below the percentage of OOUs and the aggregate distribution of lenders. In moderate-income geographies, the proportion of loans was below the percentage of OOUs and near to the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was consistent with performance during the 2017 to 2019 period.

Tucson MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.7 percent) and constrained lending opportunities was noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (930 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income geographies was below the percentage of OOUs and the aggregate distribution of lenders. In moderate-income geographies, the proportion of loans was below the percentage of OOUs and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance in 2017 to 2019. The proportion of loans in low- income geographies was well below the percentage of OOUs and the aggregate distribution of lenders. In moderate-income areas, the distribution was below the percentage of OOUs and substantially met the aggregate distribution of lenders.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses is adequate. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of businesses in those geographies and the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was consistent with performance during the 2017 to 2019 period.

Tucson MSA

- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income geographies was near to the proportion of businesses in those geographies and substantially met the aggregate distribution.
- During 2014 to 2016, the bank's performance was generally consistent with performance in 2017 to 2019. The 2014 to 2016 performance in low- and moderate-income geographies substantially met the proportion of businesses and respectively met and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Arizona 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- The limited percentage of farms in low-income geographies (5.5 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The high level of competition in the AA (30 lenders) and the fact that farm lending is not a focus of the bank was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans to small farms in low- and moderate-income geographies was respectively well below and below the proportion of farms in those geographies and below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. The proportion of loans to small farms in low- and moderate-income geographies was respectively well below and below the proportion of farms in those geographies and below the aggregate distribution.

Tucson MSA

- The limited percentage of farms in low-income geographies (4.4 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The high level of competition in the AA (13 lenders) and the fact that farm lending is not a focus of the bank was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank made no small farm loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms in those geographies and significantly exceeded the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. The bank made no small farm loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Economic Data for this full-scope AA.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.

- During 2014 to 2016, the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.

Tucson-Nogales MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the lending performance to low-income borrowers was generally consistent with the 2017 to 2019 performance while lending performance to moderate-income borrowers was slightly weaker. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans met both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Tucson-Nogales MSA

- Greater significance was placed on performance against the aggregate distribution lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Arizona 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

Phoenix-Mesa-Chandler MSA

- The high level of competition in the AA (30 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.

Tucson MSA

- The high level of competition in the AA (13 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank 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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Phoenix-Mesa-Chandler MSA

The bank made 27 CD loans in the AA for a total of \$227 million, which represents 6.9 percent of the tier 1 capital allocated to the AA. The bank's CD loans within the AA were responsive to identified community needs with the primary purposes of affordable housing and community service. The bank's CD loans for affordable housing helped create or retain approximately 900 affordable housing units.

Examples of CD loans include:

- In December 2018, the bank originated a \$12 million loan to finance the purchase of tax-exempt construction bonds. Proceeds of the purchase of the bonds were used to finance the new construction of an affordable housing development in Surprise, AZ. The project provided 100 affordable housing units that are restricted to households with income of 60 percent or less of the AMI.
- In May 2018, the bank originated a \$3.8 million loan to a school district. The school district serves a student population where 85 percent are from low- and moderate-income families. The funding was used to construct and renovate school facilities, including acquisition of land, improvement of the general facility and grounds, purchase of pupil transportation vehicles, and payment of costs associated with the issuance of the bonds.
- In April 2015, the bank funded a \$3.7 million Taxable Qualified School Construction Bond. The financing was used for the lease-purchase of equipment for three of the schools in district 210.

Tucson-Nogales MSA

The bank made nine CD loans in the AA for a total of \$53 million, which represents 10.9 percent of the tier 1 capital allocated to the AA. The bank's CD loans within the AA were for the primary purposes of affordable housing and community service. The bank's CD loans were responsive in providing affordable housing and educational opportunities to meet the needs of those in the AA.

Examples of CD loans include:

- In June 2017, the bank provided a \$1 million loan to a non-profit organization that serves the rural poor throughout the state of Arizona, including the bank's AA. The entity offers education, training, and practical life skills.
- In June 2017, the bank funded an \$11 million loan for the construction of 70 units of housing in Tucson. All units were for individuals earning 60 percent or less of the AMI.

- In September 2017, the bank originated a \$4.7 million loan for construction of 80 affordable housing units in a multifamily project in the AA. The project consists of 100 multifamily units restricted to individuals earning 60 percent or less of the AMI.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve credit needs in each of the full-scope AAs reviewed. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

Phoenix-Mesa-Chandler MSA

The bank funded 10,237 loans totaling \$2 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	2,209	418,041
FHA	2,301	362,460
HARP	1,839	269,270
VA	1,956	474,197
SBA	642	268,729
USDA	1,290	180,610

Tucson-Nogales MSA

The bank funded 2,648 loans totaling \$432.7 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	190	27,588
FHA	699	95,629
HARP	483	59,134
VA	613	133,787
SBA	92	28,216
USDA	571	88,346

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Sierra Vista-Douglas MSA and Yuma MSA is consistent with the bank's overall good performance. The bank's performance in the Flagstaff MSA, Lake Havasu City-Kingman MSA, Prescott Valley-Prescott MSA, and Arizona Non-MSA is weaker than the bank's overall good performance due to weaker geographic distribution of loans and neutral CD lending.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Arizona is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Phoenix-Mesa-Chandler MSA and Tucson MSA is good.

Phoenix-Mesa-Chandler MSA

The bank has a significant level of qualified CD investments and grants particularly those that are not routinely provided by private investors, although not in a leadership position. The current and prior period qualified investments represent 5.1 percent of tier 1 capital allocated to the AA. A large majority (75 percent) of total qualified investments were current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. Ninety-two percent of investments support affordable housing, four percent support community services, and four percent support economic development. These categories are CD needs in the MSA. Fifty-five grants totaled \$12 million with 54.0 percent, 36.0 percent, and 8.0 percent, supporting revitalization/stabilization, community services and affordable housing, respectively. CD investments created or retained 4,592 affordable housing units.

The bank makes extensive use of complex investments to support CD initiatives. Eleven current period investments, or 73.6 percent of the total dollar of current investments are considered complex and are primarily Direct Investor LIHTCs. Direct Investor LIHTCs require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. One CD investment and five grants, or 7.5 percent of the total dollar of current investments are catalyst investment as they are related to NMTC financing or are for other community development activities that will encourage future growth and improvements in the area.

Examples of community development investments in the AA include:

- In 2019, the bank provided a \$425 thousand grant to a community development corporation based in Phoenix for its workforce and transit-oriented housing project. Funding is for predevelopment costs associated with the construction of 190 units of workforce and affordable housing in a low-income area. The project is located on an unoccupied site that is blighted and part of a transit-oriented development, near the Ed Pastor Transit Center (a major bus hub) and the future location of the light rail extension. The project aligns with the City of Phoenix's General Plan (2015), that has a specific component for transit-oriented development that speaks to including affordable and accessible housing for areas around light rail stations, and transit centers and hubs. This involved complex financing due to the number of sources required to support the program. This activity serves as a catalyst for other community development activities as it is part of a local government plan for revitalization or stabilization that will encourage future growth and improvements in the area.
- In 2015, the bank invested \$14.5 million in a LIHTC affordable housing project. The project is for the redevelopment of a distressed office building and the creation of a 74- units of affordable housing.

Tucson MSA

The bank has an adequate level of qualified CD investments and grants particularly those that are not routinely provided by private investors, although not in a leadership position. Current and prior period qualified investments represent 2.8 percent of tier 1 capital allocated to the AA. A significant majority, or 98 percent, were current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs, including community services and affordable housing. All CD investments focused on affordable housing. Thirteen grants totaled \$1.5 million, with 89.0 percent and 11.0 percent supporting community services and affordable housing, respectively. CD investments created or retained 301 affordable housing units.

The bank makes extensive use of complex investments to support CD initiatives. An \$11 million Direct Investor LIHTC or 84.0 percent of current period investments was considered complex. Direct Investor transactions require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance.

An example of a complex community development investments in the AA follows:

- In September 2019, the bank originated a \$11 million LIHTC equity investment for the new construction of a permanent supportive housing project in Tucson. The project will provide 50 units for homeless and formerly homeless individuals and families with a preference for veterans. Thirty units will be offered at 30 percent of AMI, eleven units at 50 percent and nine units at 60 percent of AMI. There will be 46 units covered by a project-based Section 8 rental assistance from the City of Tucson. An associated nonprofit organization will provide social and supportive services for the project along with the Arizona Department of Veterans Services and the Southern Arizona VA Health Care system. In addition, the bank will provide a \$10.2 million construction loan and a \$2.2 million permanent loan to complete the project.

Qualified Investments – State of Arizona										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Phoenix-Mesa-Chandler MSA	32	40,457	69	128,317	101	53.16	168,775	79.19	0	0
Tucson-Nogales CSA	4	308	15	13,076	19	10.00	13,384	6.28	0	0
Limited Review:										
Flagstaff MSA	4	3,197	3	230	7	3.68	3,427	1.61	0	0
Lake Havasu City-Kingman MSA	4	334	3	1,030	7	3.68	1,364	0.64	0	0
Prescott Valley-Prescott MSA	7	4,292	0	0	7	3.68	4,292	2.01	0	0
Sierra Vista-Douglas MSA	1	34	1	2,025	2	1.05	2,059	0.97	0	0
Yuma MSA	4	6,131	3	2,444	7	3.68	8,686	4.08	0	0
AZ Non-Metro AAs	15	1,906	8	2,928	23	12.11	4,834	2.27	0	0
Statewide Investments with Purpose, Mandate or Function (P/M/F) to Serve AAs	0	0	16	6,302	16	8.42	6,302	2.96	0	0
Statewide Investments with No Purpose, Mandate or Function (P/M/F) to Serve AAs	1	9	0	0	1	0.53	9	0.00	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.

Statewide Investments in State of Arizona

The bank has qualified investments throughout the state of Arizona whose P/M/F include serving the AAs. All are grants to community development organizations supporting community services and economic development. There is one broader statewide investment with no P/M/F to serve a specific AA supporting affordable housing. The level of investments in the broader statewide area further supports the bank's overall good performance under the Investment Test in the state of Arizona.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Sierra Vista-Douglas MSA is consistent with the bank's good performance in the full-scope areas. The bank's performance under the Investment Test in the Yuma MSA and Flagstaff MSA is stronger than the good in the full-scope areas due to higher levels of qualified investments. The bank's performance in the Lake Havasu City-Kingman MSA, Prescott Valley-Prescott MSA, and Arizona Non-MSA AA is weaker than the bank's performance in the full-scope areas due to lower level of investments.

SERVICE TEST

The bank's performance under the Service Test in the state of Arizona is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope reviews, the bank's performance in the Phoenix-Mesa-Chandler, AZ MSA is excellent and the performance in the Tucson-Nogales, AZ CSA is good. More weight was given to the Phoenix-Mesa-Chandler, AZ AA due to the bank's larger deposit base and branch presence.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Phoenix-Mesa-Chandler, AZ MSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies the distribution is respectively below and near to the percentage of the population. The bank had nine branches in low-income geographies and 29 branches in moderate-income geographies. The distribution was augmented by three MUI tract branches that serve low-income tracts and 27 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Tucson-Nogales, AZ CSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively well below and exceeds the percentage of the population. The bank had one branch in a low-income geography and 12 branches in moderate-income geographies. The distribution was augmented by seven MUI tract branches that serve two low- and seven moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the adjacent MUI branches and confirmed they were serving those low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Phoenix-Mesa-Chandler MSA	76.0	157	69.16	5.7	18.5	31.8	43.9	10.6	23.5	33.7	31.9
Tucson-Nogales CSA	11.3	37	16.29	2.7	32.4	24.3	37.8	9.1	27.1	31.2	32.1

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

Phoenix-Mesa-Chandler, AZ MSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 466 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 23.3 percent over the prior rating period to 36 (7.7 percent) deposit-taking ATMs in low-income geographies and 93 (20.0 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Tucson-Nogales, AZ CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered alternative delivery systems, including the bank's 153 deposit-taking ATMs, online banking, mobile banking, and telephone banking in evaluating the bank's ability to deliver retail banking services to individuals in LMI geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 25.9 percent over the prior rating period to two (2.3 percent) deposit-taking ATMs in low-income geographies and 32 (36.4 percent) ATMs in moderate-income geographies. Bank-provided data for online, mobile, and telephone banking

showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Phoenix-Mesa-Chandler MSA	1	42	0	-7	-20	-14
Tucson-Nogales CSA	1	7	-2	-1	-1	-2

Phoenix-Mesa-Chandler, AZ MSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in the low-income geographies and closed seven branches in moderate-income geographies. Branch closures were due to the bank's strategy to exit the market, reduced customer usage, and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and on Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Tucson-Nogales, AZ CSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed two branches in low-income geographies and one branch in a moderate-income geography. Branch closures were due to reduced customer usage and proximity to other Chase branches. Bank data indicated the use of nearby branches by individuals residing in low- and moderate-income geographies. The accessibility of the nearby branches to low-income individuals mitigates the impact of the branch closures.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

Phoenix-Mesa-Chandler, AZ MSA

The bank is a leader in providing CD services that are responsive to identified needs in the AA.

Bank employees provided financial, job-specific expertise, or technical assistance for 1,742 CD activities to 30 groups for a total of 8,058 hours during the evaluation period. The majority of the bank's assistance went to organizations that provide services to low- and moderate-income individuals and families. These services were responsive to the needs for financial literacy and affordable housing. The following are examples of CD services provided in this AA.

- Bank employees provided 139 homeownership and financial literacy seminars for low- and moderate-income customers through partnership with a non-profit organization.
- Bank employees provided more than 3,200 hours of financial literacy training through a partnership with a non-profit dedicated to educating students about entrepreneurship, work readiness, and financial literacy.

Tucson-Nogales, AZ CSA

The bank is a leader in providing CD services that are responsive to identified needs in the AA.

Review of bank records show that employees provided financial or job-specific expertise and/or technical assistance for 240 CD services to eight organizations, for a total of 750 hours. A substantial amount of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. These services were responsive to the identified needs in the AA, including financial literacy, homebuyer education, and financial capability building. The following are examples of CD services provided in this AA.

- A bank employee provided a first-time homebuyer seminar for 26 low- and moderate-income individuals interested in homeownership in coordination with a nonprofit that served the low- and moderate-income community.
- A bank employee provided a financial literacy seminar to 20 low- and moderate-income individuals covering the basic concepts of financial literacy as it relates to everyday economics and how they apply this information into adulthood.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Prescott, AZ and Yuma, AZ AAs is stronger than the bank's overall performance under the Service Test in the full-scope areas due to better branch distribution in low- and moderate-income geographies. The bank's performance under the Service Test in the Flagstaff, AZ; Lake Havasu City-Kingman, AZ; Sierra Vista-Douglas, AZ; and Arizona Non-Metropolitan AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas due to weaker percentage of branch distribution in low- and moderate-income geographies.

State Rating

State of California

CRA rating for the State of California¹⁰: 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:

- An excellent level of lending activity.
- Excellent geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which positively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified CD investments that displayed excellent responsiveness to community economic development needs.
- The significant use of complex investments.
- Broader statewide investments, which positively affected the rating.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in California

The state of California is Chase's 3rd largest rating area based on aggregate deposits of \$157.7 billion, representing 11.2 percent of the bank's total deposits. As of December 31, 2019, the bank operated 977 branches and 3,875 ATMs within the rating area, representing 20 percent of total branches and 23.5 percent of total ATMs. The bank originated and purchased approximately \$255.9 billion in loans or 36.7 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 199 banks operating 6,734 branches in the state of California. Chase ranks third in deposit market share with 10.8 percent. Major competitors in the state based on deposit market share include Bank of America, N.A. ranked first (21.3 percent) and Wells Fargo Bank, N.A. ranked second (17.6 percent).

The bank delineated 15 AAs in the state of California. The Los Angeles-Long Beach, CA CSA (Los Angeles or LA CSA), San Jose-San Francisco-Oakland, CA CSA (San Francisco or SF CSA), and Bakersfield MSA, which combined account for nearly 82 percent of the deposits and 79 percent of lending in the state, received full-scope reviews. The Chico MSA, El Centro MSA, Fresno-Madera CSA, Modesto-Merced CSA, Redding-Red Bluff CSA, Sacramento-Roseville CSA, Salinas MSA, San Diego-Chula Vista-Carlsbad MSA, San Luis Obispo-Paso Robles MSA

¹⁰ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Santa Maria-Santa Barbara MSA, Visalia-Porterville-Hanford CSA, and the California Non-MSA received limited-scope reviews. The Refer to appendix A for a complete description of each AA.

Description of Full-Scope AAs

Los Angeles CSA

The following table provides a summary of the demographics that includes housing and business information for the Los Angeles CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (2.6 percent) and over 23.9 percent of families in the AA are low-income. The Los Angeles CSA's high cost of housing also limits access to affordable homeownership among LMI borrowers. The median housing value in the Los Angeles CSA ranges from five to seven times the median income, over ten times the moderate-income, and up to 14 times the low-income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. The NAR 4Q2019 median sales price was \$617,300 for the Los Angeles CSA. 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.

In the Los Angeles CSA, assuming a 30-year mortgage with a 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 \$38,576 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$179,650 mortgage with a payment of \$964 per month; a moderate-income borrower earning \$61,726 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$287,460 mortgage with a payment of \$1,543 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,925	8.1	28.5	28.6	33.2	1.6
Population by Geography	18,388,091	7.6	28.6	29.4	33.8	0.5
Housing Units by Geography	6,346,543	6.7	26.2	29.2	37.5	0.4
Owner-Occupied Units by Geography	3,074,292	2.6	18.6	30.8	47.9	0.1
Occupied Rental Units by Geography	2,780,656	11.3	34.6	27.1	26.4	0.6
Vacant Units by Geography	491,595	6.4	26.1	31.5	35.3	0.7
Businesses by Geography	1,537,819	4.7	19.9	27.2	46.6	1.5
Farms by Geography	19,819	3.7	20.7	31.7	43.3	0.6
Family Distribution by Income Level	4,090,774	23.9	16.5	17.6	42.0	0.0
Household Distribution by Income Level	5,854,948	25.3	15.6	16.5	42.6	0.0

Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$86,003	Median Housing Value	\$449,452
Median Family Income MSA - 31084 Los Angeles-Long Beach- Glendale, CA	\$62,703	Median Gross Rent	\$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks- Ventura, CA MSA	\$86,766	Families Below Poverty Level	13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino- Ontario, CA MSA	\$61,507		
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to the Moody's Analytics November 2019 report, the strengths of the Los Angeles area include a strong healthcare base and growing technology presence that provides well-paying jobs; and global links through tourism, entertainment, and tourism. However, the labor market is tight, and at 4.4 percent the jobless rate is at a historic low. Difficulty finding labor is driving up wages and pressuring profits. The area has a high cost of living and a high cost of doing business and is prone to disasters such as drought, wildfires, and earthquakes; all issues that can impact population migration.

The Los Angeles area has long been the epicenter of the entertainment industry, however, the outlook for the area's entertainment industry is uncertain. Los Angeles is losing out to North Carolina, Michigan, Georgia, Louisiana, and other localities that have spent millions to attract film productions.

Major employment sectors include education and health services; professional and business services; government; and leisure and hospitality services. Major employers in the Los Angeles area include University of California Los Angeles; Kaiser Permanente; University of Southern California; and Northrup Grumman Corp. In terms of housing, labor shortages and higher material costs are limiting new residential construction. Multifamily starts are flat this year and single-family starts, though up since the first quarter, are below the 2018 average.

Community Contacts

Four community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing and economic development/small business. Contacts noted that the Los Angeles area has an extremely diverse population. Gentrification and displacement are a concern as low-income individuals get pushed out of certain communities and must relocate to more affordable areas within the region. Parts of the area such as Los Angeles and the Oxnard-Thousand Oaks-Ventura area have a very high cost of living which poses multiple challenges for low-income residents. Contacts also noted that there is a lack of private capital flowing into low- and moderate-income areas. Credit and community development needs mentioned for the area include:

- Affordable rental housing in areas experiencing population growth
- Homebuyer counseling

- Support for financial education/literacy and self-sufficiency programs for low-income households and individuals
- Technical assistance for small businesses
- Flexible capital resources for newer small businesses; and
- More financing for affordable multi-family housing development.

Contacts noted that there are numerous opportunities for banks to help address credit and community development needs by offering flexible lending products for both affordable housing and small businesses; grant support; and technical assistance to non-profit organizations.

San Francisco CSA

The following table provides a summary of the demographics that includes housing and business information for the San Francisco CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (3.9 percent) and over 23.9 percent of families in the AA are low-income. The San Francisco CSA's high cost of housing also limits access to affordable homeownership among LMI borrowers. The area's median housing value in the San Francisco CSA ranges from five to ten times the median income. The NAR 4Q2019 median sales price was \$990,000 for the San Francisco CSA. 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.

Using the same assumptions as above for the San Francisco CSA, a low-income borrower making \$57,486 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$267,715 mortgage with a payment of \$1,437 per month; a moderate-income borrower earning \$91,985 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$428,378 mortgage with a payment of \$2,300 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Francisco CSA 2017-2019						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	1,791	9.9	22.2	34.4	32.3	1.3
Population by Geography	8,493,558	9.3	22.5	35.8	32.0	0.4
Housing Units by Geography	3,185,146	8.9	21.3	36.0	33.4	0.3
Owner-Occupied Units by Geography	1,659,837	3.9	17.0	37.4	41.6	0.1
Occupied Rental Units by Geography	1,333,808	14.7	26.5	34.4	23.7	0.6
Vacant Units by Geography	191,501	12.1	21.9	35.8	29.6	0.6
Businesses by Geography	729,357	8.7	18.4	32.9	39.5	0.5
Farms by Geography	14,870	4.9	17.5	39.6	38.0	0.1
Family Distribution by Income Level	1,986,669	23.9	16.2	18.4	41.5	0.0
Household Distribution by Income Level	2,993,645	25.7	15.1	16.7	42.5	0.0
Median Family Income MSA - 34900 Napa, CA MSA		\$80,921	Median Housing Value			\$600,004
Median Family Income MSA - 36084 Oakland-Berkeley-Livermore, CA		\$93,822	Median Gross Rent			\$1,512

Median Family Income MSA - 41884 San Francisco-San Mateo-Redwood City, CA	\$103,742	Families Below Poverty Level	8.0%
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA	\$107,126		
Median Family Income MSA - 42034 San Rafael, CA	\$121,130		
Median Family Income MSA - 42100 Santa Cruz-Watsonville, CA MSA	\$81,912		
Median Family Income MSA - 42220 Santa Rosa-Petaluma, CA MSA	\$77,587		
Median Family Income MSA - 44700 Stockton, CA MSA	\$59,946		
Median Family Income MSA - 46700 Vallejo, CA MSA	\$77,061		
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0 percent (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to Moody's Analytics November 2019 Report, the economy in the area is strong. The unemployment rate is historically low. The San Francisco and San Jose portions of the AA have a well-educated and highly skilled workforce. Technology firms are the driving force of the economy, particularly in Silicon Valley, located in the southern portion of the region. The Oakland portion of the assessment area benefits from its proximity to Silicon Valley and is a more affordable option for technology firms looking for a Bay Area address with lower cost industrial and office space. The Bay Area is the world's premier destination for the development of new tech products and services, and Oakland is an escape valve for neighboring San Francisco. Educational attainment is also among the nation's highest and the area boasts major universities, national laboratories, and many private sector technology firms. Weaknesses within these portions of the AA include high living costs, congestion, and the high cost of housing. Housing affordability is a significant concern in this portion of the AA. The housing market is tight and low affordability is weighing on housing demand. Major employment industries in the area include professional and business services and education and health services. Major employers include Apple, Inc.; Alphabet; Stanford University; University of California San Francisco, Genentech; and Wells Fargo Bank, N.A.

Community Contacts

Six community contacts completed with organizations serving the area during the examination period were reviewed to ascertain credit and community development needs. Contacts were completed with organizations focused on affordable housing; small business and economic development; community services; youth services; and workforce development. Contacts noted that housing costs in the area are skyrocketing and that households need incomes more than \$150,000 to qualify for a mortgage, provided they can even find a house to purchase. This is especially a challenge in Oakland and San Francisco. Many low- and moderate-income households are being displaced as higher wage-earning individuals move into areas that have previously been deemed affordable. There is a growing wealth gap in the area. The "gig economy" (without benefits) is taking the place of full-time employment. Commercial space is hard to find, impacting small businesses. Small mom and pop businesses in what had traditionally been low-income neighborhoods are being displaced. Employees of smaller businesses can

no longer afford to live in the city centers and are being forced to move further away to areas that are more affordable thereby increasing commute times and congestion. Contacts identified multiple community needs and indicated that there are ample opportunities for financial institutions to support these needs. Needs identified include the following:

- Grants for a variety of needs including operations, loan loss reserves, small business, foreclosure prevention, financial education, and technical assistance providers were mentioned;
- Multi-year grant commitments;
- Financial literacy education by partnering with non-profit organizations that is customized for various community needs such as refugees, small businesses, and consumers;
- Small dollar loans for small businesses (\$500 - \$50,000);
- Funding for Micro-lending Programs;
- Small business loans including term loans and lines of credit;
- Consumer loans tailored for low- and/or moderate-income;
- Pilot special programs with nonprofits for first time home buyers and small businesses;
- Down Payment Assistance programs;
- CDFI investments; and
- Equity equivalent investments to provide low cost capital.

Bakersfield MSA

The following table provides a summary of the demographics that includes housing and business information for the Bakersfield MSA. Table A indicates that the volume of OOU's is small in low-income census tracts (5.6 percent) and over 24.8 percent of families in the AA are low-income. The Bakersfield MSA's cost of housing is generally more reasonable than the nearby Los Angeles area making access to homeownership generally more affordable for moderate-income borrowers, though a challenge for low-income borrowers. The median housing value in the Bakersfield MSA (\$160,795) is three times the median income. 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.

Using the similar assumptions as above for the Bakersfield MSA, a low-income borrower making \$26,324 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$74,213 mortgage with a payment of \$789 per month; a moderate-income borrower earning \$42,119 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a 154,113 mortgage with a payment of \$1,263 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Bakersfield MSA 2017-2019						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	151	9.3	26.5	29.1	31.8	3.3
Population by Geography	865,736	9.7	23.3	31.8	33.0	2.3
Housing Units by Geography	289,529	9.9	21.6	32.9	35.5	0.1
Owner-Occupied Units by Geography	147,125	5.6	15.8	32.3	46.2	0.1

Occupied Rental Units by Geography	112,575	14.8	29.3	31.9	23.9	0.1
Vacant Units by Geography	29,829	13.1	21.4	39.3	26.1	0.1
Businesses by Geography	43,852	5.7	19.9	27.5	46.1	0.7
Farms by Geography	1,732	4.5	20.9	32.2	40.3	2.1
Family Distribution by Income Level	196,097	24.8	16.4	16.1	42.7	0.0
Household Distribution by Income Level	259,700	25.5	16.2	15.8	42.6	0.0
Median Family Income MSA - 12540 Bakersfield, CA MSA	\$52,649	Median Housing Value			\$160,795	
		Median Gross Rent			\$927	
		Families Below Poverty Level			19.4%	
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics November 2019 report, the Bakersfield area's strengths include a favorable location for warehousing and distribution: abundant farmland, and a young population with improving migration. The area's weaknesses include low industrial diversity; low educational attainment; and high poverty. The area has fallen behind Fresno as the state's largest agricultural-producing county, and the area's farming sector will require fewer workers over the short term. Table grapes, the metro area's largest crop, will likely see a smaller harvest in 2019 than in the previous year. Prices hit a five-year low earlier in 2019 and remain below the long-term average, pressuring farmers' bottom lines. Bakersfield is the world's largest almond producer and according to government estimates, the almond harvest will be similarly reduced. Labor costs remain high, exacerbated by stricter immigration policies that disproportionately affect agriculture by limiting access to seasonal migrant workers. Bakersfield does have a large military presence, which helps to provide some economic stability to the area. Major employers in the area include Edwards Airforce Base; China Lake Naval Weapons Center; Grimmway Farms; and Bolthouse Farms. Despite a stable number of housing starts and steady, above-average price appreciation, low affordability in this high-poverty metro area is holding back stronger growth.

Community Contacts

Two community contacts completed during the examination period with organizations serving the AA were reviewed. Contacts were completed with organizations focused on affordable housing and small business. Contacts noted that the area has a high percentage of very low-income households. Opportunities exist for local financial institutions to provide direct services like flexible branch hours, low cost savings accounts, and other products tailored to low-income individuals. Contacts indicated that there is a huge need for affordable housing. The county has lower housing costs relative to the rest of the state; however, income levels are also very low. The supply of affordable housing has not kept up with demand. In addition to affordable housing, other needs identified in the area include:

- Small business lending; particularly micro-loans and smaller dollar business loans;
- Collaboration for regional economic development;
- Financial support for start-up businesses; and

- Grants, loan capital or land to non-profit organizations to help with operating costs and other financing programs.

Scope of Evaluation in California

The Los Angeles CSA, San Francisco CSA, and Bakersfield MSA received full-scope reviews. The Los Angeles CSA and San Francisco CSA combined account for nearly 82 percent of the deposits and 79 percent of lending in the state. More weight was placed on performance in the Los Angeles CSA based on the bank's higher level of deposits and lending. The Bakersfield MSA was also evaluated using full-scope procedures as it has not received a full-scope review in prior performance evaluations. The remaining 12 AAs in the state of California received limited-scope reviews. Performance in limited-scope AAs and their effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

The bank's performance under the Lending Test in the state of California is rated Outstanding.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles CSA and the San Francisco CSA is excellent and performance in the Bakersfield MSA is good. Overall excellent lending levels, geographic distribution of loans, and CD lending offset weaker but good borrower distribution. Product innovation and flexibility was considered favorably.

Lending Activity

Lending levels reflect an excellent responsiveness to the credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 27.4 percent and 71.7 percent of the loan volume in the state by number and 89.3 and 6.5 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.5 percent of the loan volume in the state by number and 0.03 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Los Angeles-Long Beach CSA	167,068	479,243	1,321	2,616	650,248	49.7	53.6
San Jose-San Francisco-Oakland CSA	105,067	271,815	1,510	842	379,234	29.0	28.2
Bakersfield MSA	3,240	7,990	200	13	11,443	0.9	0.8
Sacramento-Roseville CSA	20,641	47,093	547	194	68,475	5.2	3.5
Fresno-Madera CSA	4,988	10,619	670	24	16,301	1.3	1.0
Modesto-Merced CSA	4,954	5,558	460	4	10,976	0.8	0.8
Visalia-Porterville-Hanford CSA	1,506	1,280	130	0	2,932	0.2	0.1
Redding-Red Bluff CSA	1,245	2,755	72	4	4,076	0.3	0.2
Salinas MSA	3,375	5,292	109	25	8,801	0.7	1.1
San Diego-Carlsbad MSA	36,614	85,799	444	526	123,383	9.4	8.2
San Luis Obispo-Paso Robles MSA	3,142	6,294	155	8	9,599	0.7	0.7
Santa Maria-Santa Barbara MSA	3,932	8,257	144	28	12,361	0.9	0.9
Chico MSA	975	2,618	111	7	3,711	0.3	0.5
El Centro MSA	649	809	52	5	1,515	0.1	0.1
California Non-MSA	1,364	3,810	167	6	5,347	0.4	0.5
Total	358,760	939,232	6,092	4,302	1,308,386	100.0	100.0

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

Dollar Volume of Loans* (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Los Angeles-Long Beach CSA	113,225,890	9,120,145	17,269	4,890,864	127,254,168	49.7	53.6
San Jose-San Francisco-Oakland CSA	74,692,069	4,380,661	17,083	3,138,949	82,228,762	32.1	28.2
Bakersfield MSA	693,896	160,848	3,872	42,644	901,259	0.4	0.8
Sacramento-Roseville CSA	8,965,703	739,510	5,754	597,973	10,308,940	4.0	3.5
Fresno-Madera CSA	1,140,225	200,063	9,620	90,917	1,440,825	0.6	1.0
Modesto-Merced CSA	1,075,741	89,542	5,421	9,186	1,179,890	0.5	0.8
Visalia-Porterville-Hanford CSA	283,404	23,597	1,715	0	308,716	0.1	0.1
Redding-Red Bluff CSA	252,444	43,799	564	9,721	306,528	0.1	0.2
Salinas MSA	1,877,577	91,665	2,034	73,308	2,044,584	0.8	1.1
San Diego-Carlsbad MSA	21,451,722	1,547,137	5,621	1,314,893	24,319,373	9.5	8.2
San Luis Obispo-Paso Robles MSA	1,409,194	107,926	1,679	19,738	1,538,537	0.6	0.7
Santa Maria-Santa Barbara MSA	2,956,717	139,501	1,964	105,779	3,203,961	1.3	0.9
Chico MSA	278,389	51,358	1,819	30,342	361,908	0.1	0.5
El Centro MSA	108,234	16,499	708	28,054	153,495	0.1	0.1
California Non-MSA Total (Ukiah, Eureka-Arcata, Inyo)	316,368	50,133	2,018	12,585	381,104	0.2	0.5

County, Siskiyou County, Clearlake, and Crescent City)							
Total	228,727,573	16,762,384	77,141	10,364,950	255,932,050	100.0	100.0

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

Los Angeles CSA

Chase ranked third in deposits out of 130 institutions with a market share of 13.2 percent.

In overall home mortgage lending, Chase ranked third out of 1,057 lenders with a 5.5 percent market share. No single lender dominated the market. The two lenders ranked first and second in the market are respectively Wells Fargo Bank, N.A. (7.7 percent) and Bank of America, N.A. (6.9 percent).

In small loans to businesses, Chase ranked second out of 275 lenders with 18.1 percent market share. Other major lenders are American Express National Bank (21.8 percent), Bank of America, N.A. (13.6 percent), and Citibank, N.A. (12.3 percent).

In small loans to farms, Chase ranked first out of 30 lenders with a 29.5 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (21.7 percent), Bank of America, N.A. (17.8 percent), and U.S. Bank, N.A. (14.1 percent).

San Francisco CSA

Chase ranked fifth in deposits out of 92 institutions with a 7.7 percent market share.

In overall home mortgage lending, Chase ranked third out of 855 home mortgage lenders with 6.0 percent market share placing it in the top one percent of lenders. This is a very competitive market. The two lenders ranked first and second in the market are respectively Wells Fargo Bank, N.A. (11.6 percent), and Bank of America, N.A. (8.9 percent).

In small loans to businesses, Chase ranked first out of 208 lenders with 22.7 percent market share. The other major lenders are American Express National Bank (17.9 percent), Bank of America, N.A. (13.1 percent), and Wells Fargo Bank, N.A. (11.4 percent).

In small loans to farms, Chase ranked first out of 32 lenders with a 24.5 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (18.4 percent), Bank of America, N.A. (11.0 percent), and Farmers & Merchants Bank. (10.5 percent).

Bakersfield MSA

Chase ranked third in deposits out of 20 institutions with 12.9 percent market share.

In overall home mortgage lending, Chase ranked ninth out of 526 lenders with 2.7 percent market share placing it in the top 2 percent of lenders. This is a very competitive market with no single lender dominating. The top four lenders with market share are Wells Fargo Bank, N.A. (6.6 percent), Quicken Loans (3.7 percent), Loan Depot.com LLC (3.6 percent), and Kern Schools Federal Credit Union (3.4 percent).

In small loans to businesses, Chase ranked third out of 95 lenders with 12.2 percent market share. The two lenders ranked first and second in the market are respectively American Express National Bank (15.1 percent) and Citibank, N.A. (14.0 percent).

In small loans to farms, Chase ranked second out of 18 lenders with a 21.9 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (31.8 percent), Bank of America, N.A. (14.3 percent), and Capital One, N.A. (9.9 percent).

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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is excellent. The following information was taken into consideration when determining this rating.

Los Angeles CSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (2.5 percent), and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (1,057 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas exceeded the percentage of owner-occupied units and aggregate distribution of loans. In moderate-income areas, the proportion of loans substantially met the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies exceeded the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and near to the aggregate distribution of loans.

San Francisco CSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.9 percent), and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.

- The high level of competition in the AA (855 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income geographies respectively exceeded and substantially met the percentage of owner-occupied units and was near to the aggregate distribution of all lenders.
- Between 2014 and 2016, the proportion of loans in low- and moderate-income areas was respectively near to and below the percentage of owner-occupied units and was below the aggregate distribution of loans for low- and moderate-income geographies.

Bakersfield MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (5.6 percent), and constrained lending opportunities was noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (526 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was well below the percentage of owner-occupied units and below the aggregate distribution of loans. The proportion of loans in moderate-income areas was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- Between 2014 and 2016, the proportion of loans in low-income areas was well below the percentage of owner-occupied units and near to the aggregate distribution of loans. The proportion of loans in moderate-income areas was below the percentage of owner-occupied units and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

Los Angeles CSA

- The small proportion of businesses in low-income geographies (4.7 percent) and competition between 275 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above

under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.

- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.

San Francisco CSA

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited affordable commercial space.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low-income geographies was below the proportion of businesses and exceeded the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution.

Bakersfield MSA

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business, high wage costs and limited migrant workforce needed for some businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was respectively below and near to near to both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low-income geographies was respectively well below the proportion of businesses and below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

Los Angeles CSA

- The limited number of farms in low-income geographies, (3.7 percent), and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies met the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and near to the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans to small farms in low- and moderate-income geographies was below the proportion of farms in those geographies and well below and below the aggregate distribution for the respective geographies.

San Francisco CSA

- The limited percentage of farms in low-income geographies, (4.9 percent), and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms and exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms and exceeded the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was well below the proportion of farms and near to the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was near to both the proportion of farms and the aggregate distribution.

Bakersfield MSA

- The limited percentage of farms in low-income geographies, (4.5 percent), and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of farms in those geographies.

- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms and near to the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms and below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker in low-income geographies and stronger in moderate-income geographies than performance during the 2017 to 2019 period. The percentage of farms in low-income geographies was very low during the 2014 to 2016 period and the bank made no small loans to farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies exceeded both the proportion of farms and the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Los Angeles CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and significantly exceeded the aggregate distribution.

- During 2014 to 2016, the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and was near to the aggregate distribution.

San Francisco CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and near to the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was well below both the proportion of moderate-income families and the aggregate distribution.

Bakersfield MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and near to the aggregate distribution.
- During 2014 to 2016, the bank's performance was stronger than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this conclusion.

Los Angeles CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

San Jose-San Francisco-Oakland CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Bakersfield MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

Los Angeles CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

San Francisco CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Bakersfield MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

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.

Los Angeles CSA

The bank made 2,616 CD loans in the AA with a total of \$4.9 billion, which represents 44.9 percent of the tier 1 capital allocated to the AA. The bank's CD loans within the AA were responsive to identified community needs, particularly the critical need for affordable housing. The substantial majority (98.4 percent) of CD loans were for affordable housing.

Examples of CD loans in the AA include:

- In December 2014, the bank originated a \$24.7 million loan to a senior housing facility for the construction of a new 108-unit affordable housing project. The project was a part of the Taylor Yard Transit Village Master Plan to redevelop one of the few remaining vacant areas in Los Angeles.
- In July 2015, the bank provided a \$20 million loan for improvements on a multifamily property consisting of 197 units, of which 189 units are affordable. The building is in a low-income census tract in Los Angeles.
- In February 2019, the bank originated a \$500,000 loan to a women's organization whose mission includes building economic mobility, particularly for low- and moderate-income women and their families, through wealth creation, housing, education, entrepreneurship, and civic engagement. A study by Mount Saint Mary's University showed that family households led by women in California were more likely to live in poverty.

San Francisco CSA

The bank made 842 CD loans in the AA with a total of \$3.1 billion, which represents 54.9 percent of the tier 1 capital allocated to the AA. The bank's CD loans within the AA were responsive to identified community needs, particularly the critical need for affordable housing. The majority (73.1 percent) of CD loans were for affordable housing purposes and loans for economic revitalization and/or stabilization represented 25.6 percent of CD loans.

Examples of CD loans in the AA include:

- In August 2014, the bank funded a \$6 million loan to improve an existing multifamily property located in a moderate-income census tract of Santa Rosa. Nearly all of the 128 apartments are for low- and moderate-income households.
- In March 2016, the bank provided a \$63 million loan to a project aimed to revitalize Redwood City's downtown area. The proceeds were used to build a 132,500 square foot office building in a low-income census tract in the oldest city on the San Francisco Peninsula. The project was part of the Downtown Precise Plan which aimed to revitalize 183 acres of the historic downtown area as hub of the overall city.

- In July 2017, the bank provided a \$14 million loan for a multifamily property, located in a low-income census tract in Antioch. The property consists of 300 units, of which, 295 units are affordable to low- and moderate-income households.
- In October 2018, the bank originated a \$73 million loan for a new residential development in Oakland. The building will contain 324 units, of which, 321 will be for low- and moderate-income households.

Bakersfield MSA

The bank made 13 CD loans in the AA totaling \$42.6 million, which represents 27.6 percent of the tier 1 capital allocated to the AA. The bank's CD loans within the AA were responsive to identified community needs, particularly the critical need for affordable housing. The majority (75.2 percent) of CD loans were for affordable housing purposes and 22.0 percent of CD lending supported community services, which is also a need for the AA.

Examples of CD loans in the AA include:

- In July 2014, the bank originated a \$5 million loan to the Taft City Elementary School District (TCESD) in Taft, CA. Funding was used for general working capital. TCESD is comprised of seven school sites in grades K-8 that serve over 2,000 students, where according to the National Center for Education Statistics (NCES), the free and reduced lunch program participation rate is 94.7 percent. The district has a commitment to provide effective instructional practices and a professional work and learning environment for low- and moderate-income students.
- In July 2017, the bank provided a \$7.5 million loan for a multifamily property. This property is comprised of 129 affordable units for low- and moderate-income households and is in a moderate-income census tract in Bakersfield. By providing the financing, Chase helped to preserve the availability of affordable housing for low- and moderate-income households.
- In May 2017, the bank funded a \$7.8 million construction loan to acquire and rehabilitate two separate properties in McFarland and Wasco. A total of 88 housing units are affordable to low- and moderate-income families and helped to produce much-needed housing for families in areas with very few multiple housing units.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs in each of the full-scope AAs reviewed. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

Los Angeles-Long Beach CSA

A total of 15,641 loans were funded totaling \$4.5 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	1,748	539,456
FHA	2,945	855,889
HARP	5,292	1,053,179
VA	2,010	749,717
SBA	2,980	1,246,014
USDA	666	102,213

San Jose-San Francisco-Oakland CSA

A total of 4,863 loans were funded totaling nearly \$1.6 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	490	173,831
FHA	963	358,126
HARP	1,736	369,078
VA	675	300,781
SBA	897	380,914
USDA	102	29,864

Bakersfield, CA MSA

A total of 995 loans were funded totaling \$173.5 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	76	12,952
FHA	263	42,510
HARP	165	23,273
VA	132	32,485
SBA	84	15,824
USDA	275	46,443

Conclusions for Areas Receiving a Limited-Scope Review

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Sacramento-Roseville CSA and Chico MSA is consistent with the bank's overall excellent performance under the Lending Test in the full-scope areas. The Fresno-Madera CSA, Modesto-Merced CSA, Redding-Red Bluff CSA, Salinas MSA, San Diego-Carlsbad MSA, San Luis Obispo-Paso Robles MSA, Santa Maria-Santa Barbara MSA, Visalia-Porterville-Hanford CSA, El Centro MSA and the California Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas due to weaker geographic and borrower distributions.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of California is rated Outstanding. Stronger performance in the majority of limited-scope AAs and statewide investments enhanced good performance in the full-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance under the Investment Test in the Los Angeles-Long Beach CSA, San Jose-San Francisco-Oakland CSA, and Bakersfield MSA is excellent.

Los Angeles-Long Beach CSA,

Based on a full-scope review, the bank's performance in the Los Angeles-Long Beach CSA is excellent.

The bank has an excellent level of qualified CD investments and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 7.5 percent of tier 1 capital allocated to the AA. A majority (81.2 percent) of total investments represents current period investments.

The bank's exhibits excellent responsiveness to credit and community economic development needs identified in the AA. Of total qualified investments, 70.8 percent focused on affordable housing, 23.7 percent on community services, 5.4 percent on revitalization/stabilization and less than one percent on economic development. Of these, 228 totaling \$20 million consisted of grants, with 73.8 percent and 15.6 percent supporting community services and affordable housing, respectively. The remaining 5.3 percent support economic development, and the same, 5.3 percent, support revitalization/stabilization.

The bank makes significant use of complex investments to support CD initiatives. Eighty-five qualified CD investments totaling \$509.6 million, or 61 percent of total area investments were complex. Transactions consist of Direct Investment LIHTCs, the use of many layers of financing (LITHC investment, construction loan, and permanent loan), complex financing structure that require multiple funding sources from multiple entities in order to implement and support the programs, and NMTC financings. Almost 12.0 percent of total qualified investments serve as a catalyst for future growth and other area improvements. The bank demonstrated leadership with one qualified investment.

Examples of community development investments in the AA include:

- The bank invested \$44.8 million in school district General Obligation Bonds. The general obligation bonds were approved for the purpose of construction of new school facilities and the modernization of existing school facilities.
- The bank originated a \$13.9 million NMTC equity investment for the redevelopment of 120,000 square feet of retail space in a shopping center. Located in two low-income census tracts, the project aligns with redevelopment plans created by the Housing Authority of the City of Los Angeles and the City of Los Angeles Department of City Planning.
- The bank invested \$20 million in Freddie Mac multifamily certificate bonds. Proceeds were used for the acquisition of a multifamily property geared to senior citizens, located in Santa Fe Springs. The property consists of 280 units, of which 160 are affordable to those earning less than 80 percent AMI.

San Jose-San Francisco-Oakland CSA

Based on a full-scope review, the bank's performance in the San Jose-San Francisco-Oakland, CA CSA is excellent.

The bank has an excellent level of qualified CD investments and grants, rarely in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 12.1 percent of tier 1 capital allocated to the AA. A significant majority or 85.5 percent of total investments represents current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA. Of total qualified investments, 87.8 percent supports affordable housing and 8.1 percent supports community services while less than one percent supports economic development. These are primary community development needs in the AA. Revitalization/stabilization represents 3.4 percent of total qualified investments. Included in the total is 181 grants totaling \$22.6 million, 87.8 percent support affordable housing, 8.2 percent support community services, 3.4 percent support revitalization/stabilization, and less than one percent supporting economic development.

The bank makes extensive use of complex investment to support CD initiatives. Fifty-two qualified investments totaling \$564.4 million or 81.0 percent of total investments were complex. Complex transactions consist of Direct Investment LIHTCs and NMTC financings. Of the 52, 25 are prior period qualified investments, and almost all are Direct Investment LIHTCs. Eight percent of total qualified investments serve as a catalyst for future growth and other area improvements.

Examples of community development investments in the AA include:

- The bank originated a \$12 million NMTC investment for construction of a kitchen and food manufacturing facility for an organization that delivers meals to homebound seniors. The bank partnered with San Francisco Community Investment Fund, Capital Impact Partners and Community Vision for this project. The facilities' production capacity will increase from 6,000 to 20,000 meals per day. The organization serves 3,600 low-income, homebound seniors. The project created 21 full time positions, filled by individuals in low-income communities due to an agreement to maintain a percentage of low-income employees.
- The bank invested \$1.1 million in a LIHTC fund, contributing to the creation of 100 affordable housing units.
- The bank provided \$35.1 million in a LIHTC investment, contributing to the creation of 287 affordable housing units.

Bakersfield MSA

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

The bank 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 current and prior period investments dollar volume represents 19.5 percent of tier 1 capital allocated to the AA. A majority (76.2 percent) of total investments represents current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA. Of total qualified investments, 80.9 percent supports affordable housing, 18.6 percent supports revitalization/stabilization, and less than one percent supports community services. Included is one grant supporting community services.

The bank occasionally uses of complex investments to support CD initiatives in this AA. Two current period investments or 18.6 percent of total area investments are considered complex supporting revitalization/stabilization. Almost 19 percent of total qualified investments serve as a catalyst for future growth and other area improvements.

Examples of community development investments in the AA include:

- The bank provided a \$3 million NMTC investment for a project which involves the development/new construction of a movie theater in a low-income census tract in Delano. This project helped to revitalize a low-income tract and acts as a catalyst for future retail development and investment. It also helped to increase local employment for low-income individuals within the City of Delano, including the creation of 115 permanent positions and 170 construction jobs.
- The bank provided \$515,000 through a LIHTC investment, which contributed to the creation of 204 affordable housing units.
- The bank provided \$15.6 million through a LIHTC investment, which contributed to the creation of 81 affordable housing units.

Qualified Investments – State of California										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total	\$(000's)	% of Total \$	#	\$(000's)
						#		% of Total \$		
Full Review:										
Los Angeles-Long Beach CSA	162	153,878	313	664,658	475	37.1	818,536	31.7	0	0
San Jose-San Francisco-Oakland CSA	125	101,292	225	595,520	350	27.4	696,813	1.4	0	0
Bakersfield MSA	15	7,204	8	23,059	23	1.8	30,262	37.3	0	0
Limited Review:										
Chico MSA	4	1,021	4	19,295	8	0.6	20,316	0.9	0	0
El Centro MSA	11	1,274	9	40,472	20	1.6	41,746	1.9	0	0
Fresno-Madera-Hanford CSA	25	5,357	24	19,168	49	3.8	24,524	1.1	0	0
Modesto-Merced CSA	3	8,480	1	3,756	4	0.3	12,236	0.6	0	0
Redding-Red Bluff CSA	7	1,045	0	0	7	0.5	1,045	0.1	0	0
Sacramento-Roseville CSA	26	21,398	37	118,179	63	4.9	139,577	6.4	0	0
Salinas MSA	5	2,827	10	28,139	15	1.2	30,966	1.4	0	0
San Diego-Chula Vista-Carlsbad MSA	36	27,714	57	217,928	93	7.3	245,642	11.2	0	0
San Luis Obispo-Paso Robles MSA	3	905	2	15,458	5	0.4	16,363	0.7	0	0
Santa Maria-Santa Barbara MSA	6	3,877	12	52,018	18	1.4	55,896	2.5	0	0
Visalia-Porterville-Hanford CSA	4	483	0	0	4	0.3	483	0.1	0	0

CA Non-Metro AAs	13	747	4	9,252	17	1.3	9,999	0.5	0	0
Other:										
Statewide Investments with Purpose, Mandate or Function to Serve AA	0	0	124	51,838	124	9.7	51,836	2.4	0	0
Statewide Investments with No Purpose, Mandate or Function to Serve AA	4	254	0	0	4	0.3	254	0.1	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.

Statewide Investments in State of California

The bank has qualified investments throughout the state of California with and without a P/M/F to serve AAs. These investments represent 2.0 percent of total qualified investment in the state of California. Seventy-one percent support community services, 19.0 percent support affordable housing, and 10.0 percent support economic development. Almost all statewide investments have a P/M/F to serve AAs. The broader statewide investments enhanced the bank's overall performance under the Investment Test for the state of California.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Chico MSA, Fresno-Madera CSA, Modesto-Merced CSA, Sacramento-Roseville CSA, Salinas MSA, San Diego-Carlsbad MSA, San Luis Obispo-Paso Robles MSA, Santa Maria-Santa Barbara MSA, El Centro MSA and CA Non-Metro AAs is consistent than the bank's excellent performance under the Investment Test in full-scope areas. Strong performance is due to high levels of qualified investments in relation to tier 1 capital. The bank's performance under the Investment Test in the Visalia-Porterville-Hanford CSA, and Redding-Red Bluff CSA is weaker than the bank's excellent performance under the Investment Test in full-scope areas. Weaker performance is due to a lower level of investments. Overall, performance in limited-scope AAs did not affect the Investment Test rating for the state of California.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope reviews, the bank's performance in the San Jose-San Francisco-Oakland CSA and Bakersfield MSA are excellent and the bank's performance in the Los Angeles-Long Beach CSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Los Angeles-Long Beach CSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is below the percentage of the population in these respective geographies. The bank had 25 branches in low-income geographies and 90 branches in moderate-income geographies. The distribution was augmented by five MUI tract branches that serve low-income tracts and 74 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

San Jose-San Francisco-Oakland CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low-income geographies the distribution is near to and in moderate-income geographies approximates the percentage of the population in these respective geographies. The bank had 19 branches in low-income geographies and 55 branches in moderate-income geographies. The distribution was augmented by eight MUI tract branches that serve low-income tracts and 37 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Bakersfield MSA

Based on the data in the table below and performance context, the branch distribution is good. In low-income geographies the distribution is near to and in moderate-income geographies is below the percentage of the population in these respective geographies. The bank had one branch in low-income geographies and two branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves low-income tracts and three MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Los Angeles-Long Beach CSA	53.6	492	50.4	5.1	18.3	26.4	48.8	7.6	28.6	29.4	33.8
San José-San Francisco-Oakland CSA	28.2	247	25.3	7.7	22.3	28.7	40.5	9.3	22.5	35.8	32.0
Bakersfield MSA	0.8	13	1.3	7.7	15.4	38.5	38.5	9.7	23.3	31.8	33.0

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

Los Angeles-Long Beach CSA

Alternative delivery systems enhanced the delivery of banking systems to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 2,302 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 87.4 percent over the prior rating period to 148 (6.4 percent) deposit-taking ATMs in low-income geographies and 508 (22.1 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

San Jose-San Francisco-Oakland CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 786 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 46.7 percent over the prior rating period to 68 (8.7 percent) deposit-taking ATMs in low-income geographies and 202 (25.7 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Bakersfield MSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 51 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 30.0 percent over the prior rating period to six (11.8 percent) deposit-taking ATMs in low-income geographies and seven (13.7 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Los Angeles-Long Beach CSA	39	53	0	+6	-12	-8
San José-San Francisco-Oakland CSA	25	26	-1	-3	-5	+8
Bakersfield MSA	0	3	0	0	-1	-2

Los Angeles-Long Beach CSA

The bank's opening of branches has improved the accessibility of its delivery systems in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch and closed one branch in low-income geographies. It closed four branches and opened ten branches in moderate-income geographies. The bank closed a net of 20 branches in MUI geographies. Closures were due to reduced customer usage, close proximity to other Chase branches, the exiting of in-store locations, and safety issues. Despite the branch closures in MUI geographies, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 4:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

San Jose-San Francisco-Oakland CSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank closed three branches and opened two branches in low-income geographies and closed six branches and opened three branches in moderate-income geographies. The bank opened a net of three branches in MUI areas. Closures were due to reduced customer usage and close proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 4:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Bakersfield MSA

The bank did not open or close any branches in low- and moderate-income geographies during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 4:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

Chase was a leader in providing CD services in the Los Angeles-Long Beach and San Jose-San Francisco-Oakland CSAs and provided a relatively high level of CD services in the Bakersfield MSA. The services were responsive to the needs of the full-scope AAs.

Los Angeles-Long Beach CSA

Bank employees provided technical assistance and/or job-specific expertise for 2,270 CD service activities to 97 organizations for a total of 6,515 hours during the evaluation period. A majority of the of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services provided were responsive to identified needs in the community, particularly financial literacy, and homebuyer counseling. The following are examples of CD services provided in the AA:

- Bank employees provided 42 first time home-buyers seminars in conjunction with an affordable housing organization to benefit low- and moderate-income families. The number of participants was not indicated in records.
- Bank employees provided 59 financial literacy workshops to low- and moderate-income individuals and families with a non-profit organization that focuses on promoting financial health in the community. The number of participants was not indicated in records.

San Jose-San Francisco-Oakland CSA

Bank employees provided technical assistance and/or job-specific expertise for 1,630 CD service activities to 76 organizations for a total of 8,292 hours during the evaluation period. Most of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services provided were responsive to identified needs in the community, particularly financial literacy, and homebuyer counseling. The following are examples of CD services provided in the AA:

- Bank employees provided 34 financial literacy seminars for low- and moderate-income youth through partnership with an organization focused on educating students. The number of participants was not indicated in records.
- Bank employees conducted 57 homebuyer education events in partnership with a local affordable housing non-profit. The number of participants was not indicated in records.

Bakersfield MSA

Bank employees provided technical assistance and/or job-specific expertise for 78 CD service activities to five organizations for a total of 288 hours. A majority of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services provided were responsive to identified needs in the community, particularly homebuyer counseling. The following is an example of a CD service provided in the AA:

- Bank employees provided 21 pre-purchase homebuyer education events for low- and moderate-income consumers. The number of participants was not indicated in records.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in

the Redding-Red Bluff MSA, Salinas MSA, Sacramento-Roseville MSA, Santa Maria-Santa Barbara MSA, and CA Non-MSA AA is stronger than the bank's overall performance under the Service Test in the full-scope areas due to better branch distribution in low- and moderate-income geographies. The bank's performance under the Service Test in the Fresno-Madera MSA and San Luis Obispo-Paso Robles MSA, is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the Chico MSA, El Centro MSA, Modesto-Merced MSA, San Diego-Carlsbad MSA, and Visalia-Porterville-Hanford CSA is weaker than the bank's overall performance under the Service Test in the full-scope area due to worse branch distribution in low- and moderate-income geographies.

State Rating

State of Colorado

CRA rating for the State of Colorado¹¹: 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:

- An excellent level of lending activity.
- Overall good geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which positively affected the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of CD investments that displayed excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex qualified investments.
- Retail service delivery systems are readily available to geographies and individuals of different income levels.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Colorado

The state of Colorado is Chase's 12th largest rating area based on aggregate deposits of \$14.0 billion, representing 1.0 percent of the bank's total deposits. As of December 31, 2019, the bank operated 115 branches and 281 deposit-taking ATMs within the rating area, representing 2.3 percent of total branches and 1.7 percent of total ATMs. The bank originated and purchased approximately \$27.5 billion in loans or 3.9 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 131 banks operating 1,446 branches in the state of Colorado. Chase ranked fourth in deposit market share with 10.0 percent. Major competitors in the state based on deposit market share include Wells Fargo Bank N.A. (22.4 percent), FirstBank (11.5 percent), and U.S. Bank, N.A. (10.7 percent).

The bank delineated four AAs in the state of Colorado. The Denver-Aurora, CO CSA (Denver CSA) received a full-scope review, accounting for 86.0 percent of the bank's deposits in Colorado. The Colorado Springs MSA, Fort Collins MSA, and Colorado Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of the AA.

Description of Full-Scope AA

Denver CSA

¹¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographic that includes housing and business information for the Denver CSA. Table A indicates that the volume of OOUs is very small in low-income CTs and over 21.3 percent of families in the AA are low-income with 7.9 percent below the poverty level. The median housing value in the Denver CSA ranges from three to four times the median income, five times the moderate-income and eight times the low-income, indicating a limited proportion of OOUs are affordable to low-income borrowers. 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.

In the Denver CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,229 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$116,656 mortgage loan with a payment of \$1,057 per month; a moderate-income borrower earning \$56,357 per year (or less than 80 percent of the FFIEC adjusted median family income in the CSA) could afford a \$217,444 mortgage loan with a payment of \$1,691 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low- and moderate-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver-Aurora CO CSA 2017-2019						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	766	8.2	23.5	34.1	33.0	1.2
Population by Geography	3,284,952	8.6	23.9	34.4	33.0	0.1
Housing Units by Geography	1,334,388	8.2	23.3	36.2	32.3	0.0
Owner-Occupied Units by Geography	800,469	4.3	18.7	36.0	40.9	0.0
Occupied Rental Units by Geography	458,444	14.7	31.2	35.6	18.4	0.0
Vacant Units by Geography	75,475	10.1	23.9	41.2	24.7	0.0
Businesses by Geography	436,971	6.2	19.1	33.4	41.1	0.3
Farms by Geography	9,772	6.3	18.3	37.0	38.0	0.3
Family Distribution by Income Level	799,082	21.3	17.5	20.5	40.7	0.0
Household Distribution by Income Level	1,258,913	23.7	16.4	18.0	41.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$286,161
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,078
Median Family Income MSA - 24540 Greeley, CO MSA		\$70,457	Families Below Poverty Level			7.9%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0 percent</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics February 2020 report, the Denver area economy is strong. The area has a high concentration of knowledge-based industries; strong in-migration and population growth; a skilled workforce and high employment diversity. The pace of job growth in the area has been robust, with strong gains in professional services, healthcare, and construction. The unemployment rate has dropped to 2.4 percent, the lowest level on record. While this decline is partially because of slower labor force growth, the tight labor market and favorable mix of job creation are rapidly driving up average hourly earnings. Technology and professional services have propelled the area's economy. The area's share of white-collar workers is among the top 5 percent nationally. Major employment industries in the area include professional and business services; health and education services; and government. Major employers in the area include HealthOne; University of Colorado Hospital; Lockheed Martin Corp.; and Centra Health. Although the area economy is strong, the area has an elevated cost of living and a significantly over-valued housing market with low and falling affordability.

Community Contacts

Examiners considered three community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on providing financing for affordable housing and technical assistance to small business. Contacts noted that despite the strong economy; housing affordability and the tight labor market are growing concerns in the area; making it more difficult to attract lower level and mid-level skilled workers such as trade workers and workers with certifications. The area is served by several non-profit organizations; community-based organizations; and community development entities that provided opportunities for area financial institutions to help meet the needs of the community. Other needs identified in the community include access to affordable housing, education and technical assistance for small businesses, particularly minority-owned small businesses, financial education classes and access to traditional banking retail products.

Scope of Evaluation in Colorado

The Denver CSA received a full-scope review. The CSA account for 86.0 percent of the deposits and 83.6 percent of the lending in the state. The remaining three AAs received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the Lending Test in the state of Colorado is rated Outstanding.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Denver CSA is excellent. Overall excellent lending levels and excellent geographic and borrower distribution of loans. The bank's leadership in

making CD loans affected the rating positively while product innovation and flexibility were also considered favorably.

Lending Activity

Lending levels reflect an excellent responsiveness to the credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 34.5 percent and 64.9 percent of the loan volume in the state by number and 90.0 and 8.0 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.52 percent of the loan volume in the state by number and 0.05 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Denver-Aurora CSA	58,611	108,580	802	114	168,107	83.6	86.0
Colorado Springs MSA	5,904	10,736	83	2	16,725	8.3	7.8
Fort Collins MSA	4,736	10,434	152	1	15,323	7.6	6.1
Colorado Non-MSA	181	721	11	0	913	0.5	0.1
Total	69,432	130,471	1,048	117	201,068	100	100

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

Dollar Volume of Loans* ('000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Denver-Aurora CSA	21,295,857	1,854,077	11,750	491,907	23,653,591	85.9	86.0
Colorado Springs MSA	1,608,987	171,442	776	18,014	1,799,219	6.5	7.8
Fort Collins MSA	1,400,141	170,024	1,457	35,000	1,606,622	5.7	6.1
Colorado Non-MSA	470,750	9,397	124	0	480,271	1.9	0.1
Total	24,775,735	2,204,940	14,107	544,920	27,539,702	100.0	100.0

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

Chase ranked third in deposits in the AA out of 76 institutions with 11.9 percent market share.

In overall home mortgage lending, Chase ranked fourth with 4.2 percent market share. This is a very competitive market with 924 home mortgage lenders and no single lender dominated the market. Other major home lenders with respective market shares are American Financing (7.0 percent), Wells Fargo Bank, N.A. (6.2 percent) and U.S. Bank, N.A. (4.3 percent).

Chase ranked first in small loans to businesses with 24.2 percent market share. There are 217 lenders in the CSA. Other major lenders and market share are American Express National Bank (14.5 percent), Wells Fargo Bank, N.A. (11.8 percent), and Citibank, N.A. (9.8 percent).

Chase ranked first in small loans to farms with 20.7 percent market share. There were 31 lenders in the MSA. Other major lenders and market share are Bank of Colorado (15.3 percent), Wells Fargo Bank, N.A. (12.6 percent) and TBK Bank, SSB (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 of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is excellent. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas consistently exceeded or substantially met the percentage of OOU's and aggregate distribution of loans.
- Performance in low- and moderate-income geographies between 2014 and 2016 was slightly weaker than the performance during the 2017-2019 period. The proportion of loans in low- and moderate-income areas was below both the percentage of OOU's and aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the bank's overall geographic distribution of small loans to businesses is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income areas was near to the percentage of small businesses located in those geographies but had weaker performance in comparison to the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 and 2016 time periods was generally consistent with 2017 to 2019. Between 2014 and 2016, the proportion of loans to small businesses in low- and moderate-income areas was near to the percentage of small businesses located in those geographies and near to the aggregate distribution of loans.

Small Loans to Farms

Refer to Table S in the state of Colorado 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies, (6.3 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.

- The high level of competition in the AA (31 lenders) and the fact that farm lending is not a focus of the bank, therefore examiners placed greater significance on performance compared to aggregate of lender.
- Between 2017 and 2018, the proportion of loans to small farms in low- and moderate-income geographies was well below and below the proportion of farms in those geographies and below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was consistent with performance during the 2017 to 2019 period. The proportion of loans to small farms in low- and moderate-income geographies was well below and below the proportion of farms in those geographies and below the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Market profile data indicates housing affordability was a challenge for low- and moderate-income borrowers.
- Market profile information for the AA indicates the population of Denver is increasing faster than the housing supply, which has caused housing prices to substantially increase and outpace income of the low- and moderate-income population, making it difficult for low- and moderate-income to afford housing.
- Greater significance was placed on lending performance to moderate-income borrowers due to the challenges limiting opportunities in lending to low-income borrowers.
- Between 2017 and 2019, the proportion of loans to moderate-income borrowers exceeded both the percentage of moderate-income families in the AA and the aggregate distribution of loans.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well-below the percentage of low-income families in the AA. The proportion of loans to low-income borrowers met the aggregate distribution of loans, which offsets the weaker performance as a proportion of low-income families in the AA.

- Performance in low-income geographies between 2014 and 2016 was consistent with 2017 to 2019 and moderate-income performance was slightly weaker than 2017 to 2019. The performance in the 2014-2016 period had no effect on the overall good lending performance.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Denver 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The high level of competition in the AA (31 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.

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.

The bank made 114 CD loans in the AA for a total of \$492 million, which represents 31.5 percent of the tier 1 capital allocated to the AA. The bank's CD loans were responsive to identified community needs with nearly 61.0 percent of CD loans were for affordable housing purposes and 38.5 percent were for revitalization purposes.

Examples of CD loans include:

- Chase originated a \$19 million loan for the new construction of apartments in Denver CSA. The project consisted of 130 units and a ground level shelter in Arroyo Village. The housing project has 35 permanent supportive housing units and 95 work force housing units. The permanent supportive housing units benefit from project-based vouchers and serve individuals and families earning up to 30 percent of the AMI and the workforce housing units serve families earning up to 50 percent of the AMI. Supportive services are provided to residents, which will also operate a homeless shelter on site including a kitchen, dining area, space for programs, dormitory-style sleeping area, community bathrooms, and showers.
- Chase originated a \$350,000 loan for a health services organization whose mission is to be the medical, behavioral health, and dental care provider of choice for low-income and other underserved people in south Boulder, Broomfield, and West Adams counties since 1977.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve credit needs in the full-scope AA reviewed. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

The bank funded 7,442 loans totaling \$1.9 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	1,514	438,453
FHA	1,932	461,941
HARP	1,252	181,700
VA	1,862	584,597
SBA	497	174,281
USDA	385	85,957

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not change the initial overall conclusions based on the AAs receiving the full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Colorado Springs MSA, Fort Collins MSA and Colorado Non-MSA is weaker than the overall excellent performance under the Lending Test in the full-scope AA. Weaker performance is due to weaker

geographical and borrower lending distributions. Performance in the limited-scope areas did not affect the overall Lending Test rating in the state of Colorado.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Colorado is rated Outstanding.

Performance in AAs receiving limited-scope reviews was factored together with performance from the AA receiving a full-scope review to determine the state's overall Outstanding Investment Test rating. Limited-scope conclusions did not affect the initial overall conclusions based on the AA receiving a full-scope review

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments dollar volume represent 18.3 percent of tier 1 capital allocated to the AA. A large majority (86.2 percent) of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in the AA including affordable housing, community services, and economic development. Ninety-six percent (\$275 million) of current and prior period CD investments focused on affordable housing, while 4 percent (\$10.5 million) related to community service. Affordable housing investments created 6,142 low- and moderate-income housing units for individuals and families. The bank provided 48 grants totaling \$7 million to a variety of organizations primarily supporting community service through workforce development. In some occurrence's grants were made in multiple years.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Current and prior period investments included 25 (\$286.1 million) complex investments, primarily single or Direct Investor LIHTC transactions with participations from federal and state governments, local housing agencies, and real estate developers. Five investments were a catalyst for future growth and other improvements.

Examples of CD investments in the AA include:

- The bank invested \$22.8 million in a LIHTC fund for affordable housing development in the AA. After origination, the bank monitors construction quality, lease-up and performance of the property through stabilization. The bank also manages the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspection. The LIHTC provides a tax incentive to construct or rehabilitate affordable rental housing for low- and moderate-income households. It subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants.

- The bank partnered with a housing authority and made a \$7.9 million single investor fund and direct LIHTC investment to provide 41 affordable rental units to low- and moderate-income individuals and families in the AA. After origination, the bank will monitor construction quality, lease-up and performance of the property through stabilization. Additionally, the bank will manage the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- From October 2016 to December 2018, three grants totaling \$4 million were provided to a public-school foundation. The grants will help the foundation assist the school system with its career program expansion by providing high school students with exposure to learning that links their school studies to future college and career pathways. Most students participating in this program are eligible for the Federal Free or Reduced Lunch program.
- The bank originated a \$4.9 million NMTC equity investment for a family health center located in southwest Denver, a Health Resources and Services Administration medically underserved community. The facility consists of approximately 40,000 square feet of building space dedicated to medical and dental services for low-income patients. The project also allows the hospital to hire approximately 142 new full-time employees including doctors, nurses, administration, food service, and cleaning/maintenance personnel.

Qualified Investments – State of Colorado										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Denver-Aurora CSA	44	39,499	74	246,566	118	72.4	286,065	76.3	0	0
Limited Review:										
Colorado Springs MSA	3	6,875	4	22,940	7	4.3	29,814	7.9	0	0
Fort Collins MSA	4	2,265	3	49,029	7	4.3	51,294	13.7	0	0
Colorado Non-MSA Total (Glenwood Springs)	0	0	0	0	0	0	0	0	0	0
Statewide Investments with (P/M/F) to Serve AAs	0	0	13	5,379	13	8.0	5,379	1.4	0	0
Statewide Investments with No (P/M/F) to Serve AAs	18	2,505	0	0	18	11.0	2,505	0.7	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.

Statewide Investments in the State of Colorado

The bank has qualified investments throughout the state of Colorado whose P/M/F includes serving the AAs. Ninety-one percent support community services and 9.0 percent support economic development. Of these, 12 grants totaling \$2.2 million were provided to a variety of organizations administering small business, financial education, and food programs. Investments with no P/M/F to serve AAs support affordable housing. Investments with and without a P/M/F to serve AAs represent 2.1 percent of total

state qualified investments. The level of investments in the broader statewide area supported the bank's overall performance under the Investment Test for the state of Colorado.

Conclusions for Area Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Colorado Springs MSA and the Fort Collins MSA is consistent with the bank's overall performance under the Investment Test in the full-scope AA. The bank's performance under the Investment Test in the Colorado Non-MSA AA is weaker than the bank's overall performance under the Investment Test in the full-scope area due to the absence of CD investments. The Colorado Non-MSA AA comprises one branch that was opened in December 2018. Performance in the limited-scope AAs did not affect the Investment Test rating for the state of Colorado.

SERVICE TEST

The bank's performance under the Service Test in the state of Colorado is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is respectively near to and exceeds the percentage of the population. The bank had seven branches in low-income geographies and 22 branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves low-income tracts and 13 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Denver-Aurora CSA	86.0	91	79.1	7.7	24.2	34.1	34.1	8.6	23.9	34.4	33.0

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

Alternative delivery systems enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 232 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 55.9 percent over the prior rating period to 22 (9.5 percent) deposit-taking ATMs in low-income geographies and 70 (30.2 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Denver-Aurora CSA	4	5	0	-2	-1	2

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low-income geographies and the bank closed two branches in moderate-income geographies. Branch closures were due to reduced customer usage and proximity to other Chase branches. The branch closures in moderate-income geographies generally did not adversely affect the distribution of branches relative to the population residing in the geographies. Branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank is a leader in providing CD services that are responsive to identified needs in the AA.

Bank employees provided technical assistance and/or job-specific expertise for 736 CD service activities to 46 organizations for a total of 3,134 hours of service, including 619 hours serving on boards. The majority of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. These services were particularly responsive to community needs for financial literacy and job training. The following are examples of CD services provided in this AA.

- A bank employee provided 239 hours of board service to a non-profit organization that provides job training to low-income women.
- Thirty bank employees provided 276 hours of financial literacy training to students.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Collins, CO MSA is consistent with the bank's overall performance under the Service Test in the full-scope area and the bank's performance under the Service Test in the Colorado Springs, CO MSA was weaker than the bank's overall performance under the Service Test in the full-scope area. The branch distribution in the Colorado Springs, CO MSA was good and weaker than the excellent distribution in the full-scope AA. There were no low- and moderate-income census tracts in the Edwards-Glenwood Springs, CO MSA which, had a neutral effect on overall conclusions.

State Rating

State of Florida

CRA rating for the State of Florida¹²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- An excellent level of lending activity.
- Good geographic distribution of home mortgage loans and small loans to businesses
- Good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in making CD loans, that had a significantly positive affect on the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- A good level of qualified CD investments that displayed excellent responsiveness to credit and community economic development needs.
- The significant use of innovative and/or complex qualified investments.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Florida

The state of Florida is Chase's sixth largest rating area based on aggregate deposits of \$38.4 billion, representing 2.9 percent of the bank's total adjusted deposits. As of December 31, 2019, the bank operated 418 branches and 1,593 deposit-taking ATMs within the rating area, representing 8.4 percent of total branches and 9.7 percent of total ATMs. The bank originated and purchased approximately \$32.7 billion in loans or 4.7 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 206 institutions operating 4,816 branches in the state of Florida. Chase ranks fourth in deposit market share with 6.4 percent. Major competitors in the state based on deposit market share include Bank of America, N.A. (19.2 percent), Wells Fargo Bank, N.A. (13.1 percent), and SunTrust Bank (8 percent).

Chase has delineated 11 AAs in Florida. The Miami-Fort Lauderdale-Port St. Lucie, FL CSA (Miami CSA) and Orlando-Lakeland-Deltona, FL CSA (Orlando CSA), which combined account for over 75 percent of the deposits and 62 percent of lending in the state, received full-scope reviews. The Cape Coral-Fort Myers-Naples CSA, Gainesville MSA, Jacksonville MSA, Lakeland-Winter Haven MSA, North Port-Sarasota CSA, Ocala MSA, Palm Bay-Melbourne-Titusville MSA, Tampa-St. Petersburg-Clearwater MSA, and Tallahassee MSA received limited-scope reviews. Refer to appendix A for a complete description of each AA.

state

Description of Full-Scope AAs

Miami CSA

The following table provides a summary of the demographics that includes housing and business information for the Miami CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (2.5 percent) and over 22.8 percent of families in the AA are low-income.

The Miami CSA is a high cost housing area, limiting access to affordable homeownership among LMI borrowers. The median housing value is \$221,822, while the NAR 4Q2019 median sales price of a single-family home is \$368,500. 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 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 \$32,173 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$149,831 mortgage with a payment of \$804 per month; a moderate-income borrower earning \$51,471 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$239,703, mortgage with a payment of \$1,287 per month.

The poverty level across the AA was considered in the 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 CSA, the overall household poverty level was 16 percent. However, in low-income geographies, the household poverty level increases to 40 percent and in moderate-income geographies it increases to 24 percent. In MUI geographies, the combined poverty level is 11 percent.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 370 Miami-Fort Lauderdale-Port St Lucie FL CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,331	6.1	27.5	30.6	33.1	2.8
Population by Geography	6,443,458	5.6	28.1	33.3	32.6	0.4
Housing Units by Geography	2,777,572	5.3	26.7	32.9	34.8	0.3
Owner-Occupied Units by Geography	1,416,581	2.5	22.0	35.4	40.0	0.1
Occupied Rental Units by Geography	858,136	10.0	36.1	31.0	22.5	0.4
Vacant Units by Geography	502,855	5.3	24.1	29.2	40.9	0.5
Businesses by Geography	1,036,006	4.1	21.6	29.7	43.4	1.1
Farms by Geography	16,733	4.3	24.1	32.6	38.7	0.3
Family Distribution by Income Level	1,477,569	22.8	17.2	17.9	42.1	0.0
Household Distribution by Income Level	2,274,717	25.0	15.8	16.7	42.5	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL		\$61,809	Median Housing Value			\$221,822

Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL	\$49,264	Median Gross Rent	\$1,178
Median Family Income MSA - 38940 Port St. Lucie, FL MSA	\$56,570	Families Below Poverty Level	13.2%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA	\$58,448		
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL	\$65,914		
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to Moody's Analytics November 2019, the Great Recession had a lasting impact on Miami's economy. At the height of the previous expansion 12 years ago, average hourly wages in the Miami MSA were \$1.70 above the U.S. average. Wages fell below the national average during the recession, and the gap between the local and national average has widened ever since. Today, the average hourly wage is \$4.30 less than the national level among major metro areas with more than one million residents. Construction jobs are set to grow twice as fast as the national average, and some of this new employment can be traced to activity at Port Miami, the world's busiest harbor for passenger ships. Over the next three years, cruise lines will build four separate terminals and two corporate offices at the port at a total cost of more than \$1.5 billion.

Major employers in the AA include University of Miami, Jackson Health System, Publix Super Markets, Baptist Health Systems of Southern Florida, and American Airlines.

The Miami MSA is transitioning into a sanctuary for affluent retirees and wealthy expatriates. Miami has the second-highest level of income inequality among major metro areas, behind New York City. Since the wealthy in Miami sustain their lifestyle with nonwage income, the area's gross domestic product has increased even as wage growth has stalled. But a looming domestic downturn and global slowdown will reduce corporate profits and stock market returns over the next couple of years. This shock will be hardest felt in the wealthy enclaves flanking the central business district and in Miami Beach, but it will impact the entire metro division.

Community Contacts

Six community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing, economic development, and community services. Low relative wages are a significant challenge for households in South Florida. The income levels are insufficient to meet housing, transportation, and other costs of living in the MSA. A community contact identified that Miami exhibits a larger income discrepancy than most other parts of the United States and the economic conditions of Miami demonstrate extreme polarization. On one hand, tourist areas and wealthy individuals provide a large economic spark, but on the other hand, many low-income individuals struggle. Housing in Miami-Dade County is very expensive, making it unaffordable to both homeowners and renters. The supply of housing stock for low- and moderate-income buyers is scarce. High student loan debt is also a barrier to affordable homeownership. Strategies to provide and preserve affordable housing are imperative for the area. Other needs mentioned for the area include:

- Affordable rental housing in areas experiencing population growth
- Financial education for individuals and small business
- Small business assistance
- Small dollar loan, working capital and lines of credit
- Support for community organizations

Orlando CSA

The following table provides a summary of the demographics that includes housing and business information for the Orlando CSA. Table A indicates that the volume of OOU is small in low-income census tracts (0.9 percent) and over 20.7 percent of families in the AA are low-income. The Orlando CSA's high cost housing area also limits access to affordable homeownership among LMI borrowers. The median housing value in the Orlando CSA (\$160,770,) is approximately four times the median income, over ten times the moderate-income, and up to six times the low-income, indicating a limited proportion of OOU are affordable to low- and moderate-income borrowers. 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 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 \$32,173 per year (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$149,831 mortgage with a payment of \$804 per month; a moderate-income borrower earning \$51,471 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$239,703, mortgage with a payment of \$1,287 per month.

The poverty level across the AA was considered in the 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 Orlando CSA, the overall household poverty level was 11.9 percent.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	544	3.5	27.2	40.8	27.2	1.3
Population by Geography	2,990,819	2.3	25.7	42.9	28.8	0.3
Housing Units by Geography	1,330,134	2.4	25.4	44.7	27.5	0.0
Owner-Occupied Units by Geography	699,336	0.9	19.1	47.1	32.9	0.0
Occupied Rental Units by Geography	384,001	4.9	36.1	39.2	19.8	0.0
Vacant Units by Geography	246,797	2.5	26.4	46.8	24.3	0.0
Businesses by Geography	385,842	1.6	24.2	38.8	35.3	0.0
Farms by Geography	9,944	1.0	23.2	45.5	30.1	0.1
Family Distribution by Income Level	714,532	20.7	18.4	19.8	41.0	0.0
Household Distribution by Income Level	1,083,337	22.8	17.0	18.6	41.6	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$160,770

Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA	\$57,304	Median Gross Rent	\$1,034
Median Family Income MSA - 45540 The Villages, FL MSA	\$60,099	Families Below Poverty Level	11.9%
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to Moody's Analytics February 2020 Report, the strengths of the Orlando CSA are in tourism, ample services related job opportunities, plentiful land for development and strong migration into the area. However, there is an abundance of low-wage jobs and low employment diversity. Also, Orlando has a high sensitivity to national and international economic conditions.

The major economic driver for the Orlando area is tourism. It is the home to Walt Disney World and Universal Orlando. These resorts house six of the eight most-visited theme parks in North America. Disney and Universal combined employ nearly 100,000 local employees. The Orange County Convention Center is the second largest conference center in the country. Among metro areas with more than 1 million residents, only the Las Vegas workforce has a larger share of employment in leisure/hospitality. The 2.8 percent unemployment rate is only fractionally higher than the lowest rate ever recorded. Major employment industries in the area include leisure and hospitality services, professional and business services, and education and health services. Major employers include Walt Disney World Resort, Universal Orlando (Comcast), Adventist Health System/Florida Hospital, Publix Super Markets Inc., and Orlando International Airport.

Although house price appreciation is slowing, the pace remains above average due to the rapid population growth.

Community Contacts

Three community contacts completed with organizations serving the area during the examination period were reviewed to ascertain credit and community development needs. Contacts were completed with organizations focused on affordable housing, small business, and workforce development. Increased demand for housing and rising home prices has made affordable housing a primary concern for Orlando. Low-income households are cost burdened and pay more than 30 percent of their income for housing and some even pay more than 50 percent. Multi-family apartment complexes are being built at a rapid pace across Orlando. There is a lack of financial access in underserved communities. A community contact reported that financial education, poor credit scores and lack of equity are the biggest impediments to small business owner's access to capital. Other needs identified include the following:

- Affordable housing and financial education
- Affordable rental housing
- First-time homebuyer counseling
- Financial education for small businesses
- Loans to small businesses for working capital and general operations
- Workforce development
- Capacity building for nonprofits

Scope of the Evaluation in Florida

The Miami CSA and the Orlando CSA received full-scope reviews. The two AAs combined account for over 75 percent of the deposits and 62 percent of lending in the state. More weight was placed on performance in the Miami CSA based on the bank's higher volume of deposits and lending. The remaining AAs in the state of Florida received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Miami CSA and the Orlando CSA is excellent. Overall excellent lending levels, good geographic distribution of loans, and good distribution of loans by income level of the borrower. CD lending had a significantly positive affect on the rating and product innovation and flexibility was considered favorably.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 23.7 percent and 75.8 percent of the loan volume in the state by number and 79.3 and 17.9 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.45 percent of the loan volume in the state by number and 0.09 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Miami- Port St. Lucie-Fort Lauderdale CSA	35,987	161,626	783	35	198,431	46.9	61.0
Orlando-Deltona-Daytona Beach CSA	18,715	50,172	296	9	69,192	16.3	14.5

Cape Coral-Fort Myers-Naples CSA	7,131	16,080	120	1	23,332	5.5	4.8
Gainesville MSA	335	1,609	30	0	1,974	0.5	0.1
Jacksonville MSA	6,531	14,883	74	5	21,493	5.1	1.9
Lakeland-Winter Haven MSA	2,808	4,115	92	1	7,016	1.7	0.7
North Port-Sarasota CSA	6,909	15,632	106	6	22,653	5.4	4.4
Ocala MSA	736	1,514	69	0	2,319	0.5	0.2
Palm Bay-Melbourne-Titusville MSA	3,652	8,047	43	2	11,744	2.8	2.7
Tallahassee MSA	443	1,293	8	1	1,745	0.4	0.0
Tampa-St, Petersburg-Clearwater MSA	17,172	46,001	288	13	63,474	15.0	9.6
Total	100,419	320,972	1,909	73	423,373	100	100

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

Dollar Volume of Loans* (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Miami-Port St. Lucie-Fort Lauderdale CSA	11,177,036	3,136,689	10,054	340,240	14,664,019	44.8	61.0
Orlando-Deltona-Daytona Beach CSA	3,941,093	853,758	3,248	208,490	5,006,589	15.3	14.5
Cape Coral-Fort Myers-Naples CSA	2,271,592	281,618	1,127	975	2,555,312	7.8	4.8
Gainesville MSA	68,132	18,755	279	0	87,166	0.3	0.1
Jacksonville MSA	1,511,059	252,489	1,266	59,397	1,824,211	5.6	1.9
Lakeland-Winter Haven MSA	463,210	68,498	6,454	5,000	543,162	1.7	0.7
North Port-Sarasota CSA	1,709,166	273,472	1,620	74,800	2,059,058	6.3	4.4
Ocala MSA	107,403	19,807	772	0	127,982	0.4	0.2
Palm Bay-Melbourne-Titusville MSA	719,692	149,678	439	12,700	882,509	2.7	2.7
Tallahassee MSA	92,658	15,241	71	10,700	118,670	0.4	0.0
Tampa-St, Petersburg-Clearwater MSA	3,904,639	811,371	3,134	135,107	4,854,251	14.8	9.6
Total	25,965,680	5,881,376	28,464	847,409	32,722,929	100	100

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

Miami CSA

The bank ranked third in deposits out of 90 institutions with a 9.2 percent market share.

In overall home mortgage lending, the bank ranked third out of 1,191 lenders with a 4.5 percent market share placing it in the top 1 percent of all lenders. There is strong competition for home mortgage lending. The top lenders were Wells Fargo Bank, N.A. (8.1 percent), Bank of America, N.A. (6.5 percent), and Quicken Loans (4.2 percent).

In small loans to businesses, the bank ranked third out of 248 lenders with a 15.3 percent market share placing it in the top 2 percent of all lenders. This is a very competitive market. The top lenders (and their market share) are nationwide lenders with substantial small business credit card portfolios and include American Express National Bank (27 percent), Bank of America, N.A. (14.7 percent), and Citibank, N.A. (7.9 percent).

In small loans to farms, Chase ranked first out of 26 lenders with a 31.4 percent market share. The other major lenders and respective market shares are Bank of America, N.A. (23.7 percent), Wells Fargo Bank, N.A. (15.3 percent), and U.S. Bank, N.A. (9.0 percent).

Orlando CSA

The bank ranked fourth in deposits out of 50 institutions with an 8.2 percent market share.

In overall home mortgage lending, the bank ranked fifth out of 1,102 lenders with 3 percent market share placing it in the top 1 percent of all lenders. There is strong competition for home mortgage lending. The top lenders were Wells Fargo Bank, N.A. (7 percent), Quicken Loans (4.4 percent), and Bank of America, N.A. (4.2 percent).

In small loans to businesses, the bank ranked second out of 178 lenders with 14.4 percent market share placing it in the top 2 percent of all lenders. This is a very competitive market. The top lenders (and their market share) are nationwide lenders with substantial small business credit card portfolios and include American Express National Bank (27 percent), Bank of America, N.A. (14.7 percent), and Citibank, N.A. (7.9 percent).

In small loans to farms, Chase ranked first out of 19 lenders with a 32.2 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (16.5 percent), Bank of America, N.A. (15.5 percent), and U.S. Bank, N.A. (9.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AAs, relative to area demographics and aggregate lending data.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is good. The following information was taken into consideration when determining this rating.

Miami CSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (2.5 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of poverty and competition in the AA (1,191 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- income areas were below the percentage of owner-occupied units and aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below both the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans.

Orlando CSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (0.9 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (1,057 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below the percentage of owner-occupied units and exceeded the aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and near to the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

Miami CSA

- The small proportion of businesses in low-income geographies (4.1 percent) and competition between 248 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and near to the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution

Orlando CSA

- The small proportion of businesses in low-income geographies (1.6 percent) and competition between 178 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below the proportion of businesses and near to the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution. The proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is adequate. The following information was taken into consideration when determining this rating.

Miami CSA

- The limited number of farms in low-income geographies (3.7 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.

- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and near to the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The bank had no farm loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution for the respective geographies.

Orlando CSA

- The limited number of farms in low-income geographies, (3.7 percent in 2017-2019; 0.84 percent in 2014 to 2016), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and near to the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans to small farms in low- and moderate-income geographies was well below and below the proportion of farms in those geographies and well below and near to the aggregate distribution for the respective geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits good 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 Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Miami CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers. Particularly, the high housing cost, limited availability of housing that low-income borrowers can afford to acquire, and poverty levels within the AA constrained lending opportunities to low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and was near to the aggregate distribution.

Orlando CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- income borrowers. Particularly, the high housing cost and limited availability of housing that low-income borrowers can afford to acquire constrained lending opportunities to low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was near to the proportion of moderate-income families and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and significantly exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was near to the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this conclusion.

Miami CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Orlando CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

Miami CSA

- The fact that farm lending is not a focus of the bank was considered.

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Orlando CSA

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

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.

CD lending had a significantly positive affect on the Lending Test rating for the state of Florida.

Miami CSA

The bank made 35 CD loans in its AA for a total of \$340.2 million, which represents 11.3 percent of the tier 1 capital allocated to the AA. Of total CD lending, 77.5 percent supported affordable housing, and 11.9 percent supported community services.

Examples of CD loans in the AA include:

- In December 2014, the bank provided an \$8.1 million loan to finance affordable housing as the National Low-Income Housing Coalition determined there was a shortage of affordable housing in this AA.
- In May 2017, the bank provided a \$1.0 million loan to an academic organization focused on implementing best practices regarding curriculum, academic intervention, and school improvement for low- and moderate-income students.
- In April 2019, the bank provided a \$36.0 million loan to the City of Pompano to assist in completing its plans that focus on low- and moderate-income individuals and reducing poverty among its residents. The city lost more than 250 jobs when a long-established manufacturing company relocated its plant operations. With the support of the bank, the city's project aims to bring new job opportunities that will help revitalize and stabilize the area.

Orlando CSA

The bank made nine CD loans in its AA for a total of \$208.5 million, which represents 29 percent of the tier 1 capital allocated to the AA. Of total CD lending, 80.3 percent supported community services and 20 percent supported affordable housing.

Examples of CD loans in the AA include:

- In May 2015, the bank funded a \$108.2 million loan to the School Board of Orange County FL to provide an effective and complete education for low- and moderate-income students.
- In December 2017, the bank provided a \$13.9 million loan to develop affordable housing in DeLand, which is an area identified as having an affordable housing gap by the National Low-Income Housing Coalition. The project resulted in the creation of 100 low- and moderate-income units.
- In March 2019, the bank provided a \$1.4 million loan to develop affordable housing in the Palm Beach County section of the AA. This project resulted in the creation of 40 low- and moderate-income units.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs, which was considered positively in determining the rating for the state of Florida.

Miami CSA

A total of 8,011 loans were funded totaling nearly \$1.4 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	934	163,890
Federal Housing Administration (FHA)	2,477	411,386
Home Affordable Refinance Program (HARP)	3,218	451,312
Veteran's Administration (VA)	625	166,173
Small Business Administration (SBA)	705	177,414
U.S. Department of Agriculture (USDA)	52	7,168

Orlando-Deltona-Daytona Beach CSA

A total of 5,608 loans were funded totaling \$883.2 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	603	107,177
Federal Housing Administration (FHA)	1,493	210,913
Home Affordable Refinance Program (HARP)	1,204	151,501
Veteran's Administration (VA)	770	177,593
Small Business Administration (SBA)	213	50,578
U.S. Department of Agriculture (USDA)	1,325	185,421

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Gainesville MSA, Lakeland-Winter Haven MSA, North Port-Sarasota CSA, Palm Bay-Melbourne-Titusville MSA, Tallahassee MSA, and Tampa-St. Petersburg-Clearwater MSA, Cape Coral, Fort Myers-Naples MSA, Jacksonville MSA and Ocala MSA is weaker than the bank's excellent performance under the Lending Test in the full-scope areas due to weaker geographic and/or borrower income distributions.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's performance in the Miami-Fort Lauderdale-Port St. Lucie CSA and Orlando Deltona-Daytona Beach CSA is good.

Miami-Fort Lauderdale-Port St. Lucie CSA

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investment dollar volume represents 3.6 percent of tier 1 capital allocated to the AA. A significant majority or 66.9 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in the AA as affordable housing, affordable rental housing, and community service. Current period investments were 82.1 percent or \$59.5 million affordable housing, 15.1 percent community service, and 1.9 percent economic development. Current and prior period investments created or supported 5,371 low- and moderate-income housing units for individuals and families. The bank provided 163 grants totaling \$17.1 million to a variety of organizations that primarily support community service and affordable housing. In some occurrences the bank provided grants in multiple years.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Current period investments include eight or \$50.2 million complex Direct Investor LIHTC transactions which require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. In addition, nine investments were a catalyst for future growth and other improvements.

Examples of CD investments in the AA include:

- The bank invested \$1.2 million in a LIHTC fund for affordable housing development in the Miami-Dade County. The project was required to set aside a number of units for low- and moderate-income individuals or households that must earn either less than 50 percent or 60 percent of the (AMI) (depending on the set-aside option chosen by the property owner) to qualify for these units.
- The bank originated an \$11.4 million Direct Investor LIHTC investment for new construction of two 4-story, elevator buildings with 100 units located in Homestead FL. All units will benefit from a rental subsidy provided and administered by Miami-Dade County through its Public Housing and Community Development Department. A Section 8 HAP contract will cover 80 units and a Section 9 public housing Annual Contribution Contract (ACC) covers 20 units. The first phase of the multiphase development will replace a former public housing complex demolished in 2014. The project was financed with \$15.5 million tax exempt bonds purchased by the bank.

Orlando Deltona-Daytona Beach CSA

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investment dollar volume represent 8.9 percent of tier 1 capital allocated to the AA. A significant majority or 84.6 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in the AA including affordable housing and affordable rental housing and community service. Eighty-two percent or \$50.2 million of investments focused on affordable housing and 7.0 percent or \$3.8 million on community service. Current and prior period investments created or supported 2,910 low- and moderate-income housing units for individuals and families. The bank provided 44 grants totaling \$8.3 million to a variety of organizations that primarily support affordable housing and community services.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. Current period investments included three complex Direct Investor LIHTC transactions which require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. The bank also invested in one NMTC project.

Examples of CD investments in the AA include:

- The bank invested \$16.3 million in a LIHTC fund. This activity is responsive to the identified need for affordable housing within the bank's AA. The LIHTC provides a tax incentive to construct or rehabilitate affordable rental housing for low- and moderate-income households. It subsidizes the acquisition, construction, and rehabilitation of affordable rental housing for low- and moderate-income tenants.
- The bank made three grants totaling \$5 million to a community loan fund to increase affordable housing in the AA. The three-year investment allows development of stable affordable housing for low- and moderate-income renters by working with innovative developers to develop multifamily rental complexes using repurposed shipping containers, purchasing bulk other real estate owned properties and rehabilitating them for affordable rental housing; and acquiring and renovating existing multifamily properties to preserve long-term affordability.

- The bank invested \$1.9 million in a NMTC that provided financing to a service entity seeking to expand and create jobs in two grocery stores in the AA. The entity was unable to secure conventional financing and traditional financing would have been at a high cost. The bank partnered with a Central Florida Community Development Entity (CDE) to finance the project. Bank financing was the final component of allocation necessary to ensure the project's success. Anticipated job growth in the two stores was 90 full-time positions available to individuals with a high school diploma.

Qualified Investments -State of Florida										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Miami-Fort Lauderdale-Port St. Lucie CSA	36	35,792	175	72,426	211	42.4	108,219	28.3	0	0
Orlando-Deltona-Daytona Beach CSA	12	9,878	49	54,274	61	12.2	64,153	16.8	0	0
Limited Review:										
Cape Coral-Fort Myers-Naples CSA	3	150	6	250	9	1.8	400	0.1	0	0
Gainesville MSA	3	22	5	11,920	8	1.6	11,942	3.1	0	0
Jacksonville MSA	4	435	20	35,238	2	4.8	35,673	9.3	0	0
Lakeland-Winter Haven MSA	3	340	5	240	8	1.6	580	0.2	0	0
North Port-Sarasota CSA	4	167	7	320	11	2.2	487	0.1	0	0
Ocala MSA	0	0	2	87	2	0.4	87	0.0	0	0
Palm Bay-Melbourne-Titusville MSA	1	0	4	546	5	1.0	546	0.2	0	0
Tallahassee MSA	0	0	2	16,207	2	0.4	16,207	4.2	0	0
Tampa-St. Petersburg-Clearwater MSA	22	10,209	48	87,937	70	14.1	98,146	25.6	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	67	42,920	67	13.5	42,920	11.2	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	16	3,273	4	172	20	4.0	3,445	0.9	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.

Statewide Investments in the State of Florida

The bank has qualified investments throughout the state of Florida with and without a P/M/F to serve AAs. These investments represent 11.3 percent of total qualified investment in Florida. Three investments totaling \$31.7 million were made for affordable housing, including two complex Direct Investor LIHTC transactions. Sixty-four grants totaling \$11.3 million were provided to a variety of organizations, primarily agencies administering financial education services to consumers. Some grants

were made in multiple years. Almost all investments have a P/M/F to serve AAs. The level of broader statewide investments supports the Investment Test rating for the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Gainesville MSA, Jacksonville MSA, Tampa-St. Petersburg-Clearwater MSA and Tallahassee MSA is stronger than the bank's good performance under the Investment Test in full-scope areas. Stronger performance is due to higher levels of qualified investments in relation to tier 1 capital. The bank's performance under the Investment Test in the Cape Coral-Fort Myers-Naples CSA, Lakeland-Winter Haven MSA, North Port-Sarasota CSA, Ocala MSA, and Palm Bay-Melbourne-Titusville MSA is weaker than the bank's good performance in the full-scope areas. Weaker performance is due to a lower level of investments.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Miami-Fort Lauderdale-Port St. Lucie, FL CSA is good and the bank's performance in the Orlando-Deltona-Daytona Beach, FL CSA is excellent.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Miami-Fort Lauderdale-Port St. Lucie, FL CSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively near to and below the percentage of the population. The bank had eight branches in low-income geographies and 37 branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that served low-income tracts and 54 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Orlando-Deltona-Daytona Beach, FL CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution respectively exceeds and is near to the percentage of the population. The bank had two branches in low-income geographies and 14 branches

in moderate-income geographies. The distribution was augmented by 15 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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-Fort Lauderdale-Port St. Lucie CSA	61.0	194	46.4	4.1	19.1	36.1	40.7	5.6	28.1	33.3	32.6
Orlando-Deltona-Daytona Beach CSA	14.5	64	15.3	3.1	21.9	46.9	26.6	2.3	25.7	42.9	28.8

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

Miami-Fort Lauderdale-Port St. Lucie CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 778 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 47.0 percent over the prior rating period to 31 (4.0 percent) deposit-taking ATMs in low-income geographies and 166 (21.3 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Orlando-Deltona-Daytona Beach CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 237 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank had 8 (3.4 percent) deposit-taking ATMs in low-income geographies and 55 (23.2 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Miami-Fort Lauderdale-Port St. Lucie CSA	24	19	-1	-2	+3	+2
Orlando-Deltona-Daytona Beach CSA	12	5	0	+3	+1	+2

Miami-Fort Lauderdale-Port St. Lucie CSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened two branches in moderate-income geographies, closed one branch in a low-income geography, and closed four branches in moderate-income geographies. Branch closures were due to reduced customer usage and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 8:30 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Orlando-Deltona-Daytona Beach CSA

The bank's opening and closing of branches has enhanced the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low-income geographies, opened four branches in moderate-income geographies and closed one branch in a moderate-income geography. The branch closure was due to reduced customer usage. Branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services in Miami-Fort Lauderdale-Port St. Lucie CSA and Orlando-Deltona-Daytona Beach CSA that are responsive to AA needs.

Miami-Fort Lauderdale-Port St. Lucie CSA

Bank records show employees provided technical assistance and/or job-specific expertise for 1,551 CD service activities to 49 organizations for a total of 6,067 qualified hours of service. A majority of the

bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. These services were responsive to community needs, particularly, financial literacy and first-time homebuyer education. The following are examples of CD services provided in this AA:

- Bank employees conducted 15 first time homebuyer seminars serving 925 low- and moderate-income individuals in partnership with a non-profit housing organization.
- A bank employee conducted 20 financial literacy seminars serving 43 low- and moderate-income individuals in partnership with a local non-profit.

Orlando-Deltona-Daytona Beach CSA

Bank records show employees provided technical assistance and/or job-specific expertise for 449 CD service activities to 15 organizations for a total of 2,074 qualified hours of service. A majority of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. These services were responsive to community needs, particularly, financial literacy and job training. The following are examples of CD services provided in this AA:

- Bank employees conducted 29 first time homebuyer seminars serving 272 low- and moderate-income individuals in partnership with a non-profit organization.
- Bank employees provided 89 financial literacy seminars to over 2,200 low- and moderate-income students through partnership with a non-profit organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Tampa-St. Petersburg-Clearwater, FL and Gainesville-Lake City, FL AAs is stronger than the bank's overall performance under the Service Test in the full-scope areas due to better branch distribution in low- and moderate-income geographies. The bank's performance under the Service Test in the Jacksonville-St. Marys-Palatka, FL-GA CSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the North Port-Sarasota, FL; Cape Coral-Fort Myers-Naples, FL; Lakeland-Winter Haven, FL; Ocala, FL; Palm Bay-Melbourne-Titusville, FL; Tallahassee-Bainbridge, FL-GA; AAs is weaker than the bank's overall performance under the Service Test in the full-scope area due to a lower percentage of branch distribution in low- and moderate-income geographies

State Rating

State of Georgia

CRA rating for the State of Georgia¹³: 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:

- A good level of lending activity.
- Overall good geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which positively affected the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of CD investments that displayed excellent responsiveness to credit and community economic development needs, and a significant level of broader statewide investments.
- Retail service delivery systems are accessible to geographies and individuals of different income levels.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Georgia

The state of Georgia is Chase's 16th largest rating area based on deposits of \$5.7 billion representing 0.4 percent of the bank's total deposits. As of December 31, 2019, the bank operated 89 branches and 257 deposit-taking ATMs within the rating area, representing 1.8 percent of total branches and 1.6 percent of total ATMs. The bank originated and purchased approximately \$10.7 billion in loans or 1.5 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 213 banks operating 2,252 branches in the state of Georgia. Chase ranked eighth in deposit market share with 2.2 percent. Major competitors in the state based on deposit market share include SunTrust Bank (21.2 percent), Bank of America, N.A. (14.7 percent), and Wells Fargo Bank, N.A.(14.6 percent) share.

Chase has one AA in the state of Georgia and consists of a portion of the Atlanta-Athens-Clarke County-Sandy Springs, GA CSA (Atlanta CSA) which received a full-scope review. Refer to appendix A for a complete description of the AA.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Atlanta CSA. Table A indicates that the volume of OOU's is very small in low-income CTs (3.3 percent) and over 22.2 percent of families in the AA are low-income, with 11.9 percent below the poverty level. The median housing value in the Atlanta CSA is three times the median income, four times the moderate-income and seven times the low-income, indicating a limited

¹³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

proportion of OOUs are affordable to low-income borrowers. 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.

In the Atlanta CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,279 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$88,285 mortgage loan with a payment of \$878 per month; a moderate-income borrower earning \$46,846 per year (or less than 80 percent of the FFIEC adjusted median family income in the CSA) could afford a \$172,026 mortgage loan with a payment of \$1,405 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta-Athens-Clarke County-Sandy Springs GA CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	858	11.3	23.4	28.4	35.9	0.9
Population by Geography	4,980,335	7.9	23.0	32.5	36.2	0.3
Housing Units by Geography	1,973,762	8.9	23.6	31.3	36.1	0.1
Owner-Occupied Units by Geography	1,109,333	3.3	17.0	35.0	44.7	0.0
Occupied Rental Units by Geography	656,271	15.6	32.9	26.2	25.0	0.3
Vacant Units by Geography	208,158	17.0	29.9	27.5	25.4	0.2
Businesses by Geography	600,750	5.9	20.7	29.6	43.3	0.6
Farms by Geography	10,147	3.8	17.2	36.1	42.8	0.2
Family Distribution by Income Level	1,187,282	22.2	16.2	17.9	43.6	0.0
Household Distribution by Income Level	1,765,604	23.0	16.1	17.4	43.5	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$192,123
Median Family Income MSA - 23580 Gainesville, GA MSA		\$58,558	Median Gross Rent			\$1,015
			Families Below Poverty Level			11.9%

*Source: 2015 ACS and 2019 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.*

Economic Data

According to the Moody’s Analytics February 2020 report, the Atlanta area economy is strong and growing. The economy is diverse, and the area has a business-friendly environment, strong demographics including a large pool of talent and healthy net migration. Job growth has a solid lead over the US with strong gains in most industries especially education, healthcare, and leisure hospitality industries. At 3.0 percent, the jobless rate is the lowest in three decades. The economic drivers for the area are high technology and logistics. The area is a major tech hub and has a deep talent pool of in-

migrants and graduates of area institutions Georgia Tech and Emory University. Hartsfield-Jackson airport is a well-established logistics hub that creates an \$82 billion economic impact and employs approximately 63,000 people. Top employers in the area include Delta Airlines, Inc., Walmart Stores, Inc., and The Home Depot Inc. Since 2013, the median prices for single family homes have increased 60 percent and dwindling the supply of affordable homes.

Community Contacts

Examiners considered four community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on affordable housing, economic development, workforce development, increase economic standards of low-income individuals, community services, and asset development and financial stability. Contacts addressed concerns regarding financing for affordable housing. Contacts noted that there are numerous opportunities for banks to help address credit and community development needs by offering flexible lending products for both affordable housing and small businesses; grant support; and technical assistance to non-profit organizations.

Scope of Evaluation in Georgia

The Atlanta CSA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

The bank's performance under the Lending Test in the state of Georgia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta CSA is excellent. Overall, excellent lending levels and CD lending offset weaker, but good geographic and borrower distribution of loans. Product innovation and flexibility was also considered favorably.

Lending Activity

Lending levels reflect an excellent responsiveness to the credit needs in the bank's AA.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.9 percent and 67.9 percent of the loan volume in the state by number and 83.5 percent and 13.4 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.2 percent of the loan volume in the state by number and 0.03 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta CSA	34,129	72,671	260	11	107,071	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Atlanta CSA	8,905,832	1,425,537	4,141	334,691	10,670,201	100	100

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

Chase ranked fifth in deposits in the AA out of 213 institutions with 3.4 percent market share.

In overall home mortgage lending, Chase ranked fifth with 2.7 percent market share. This is a very competitive market with 917 home mortgage lenders, placing Chase in the top one percent. The top lenders in this market were Wells Fargo Bank, N.A. (8.0 percent), Quicken Loans (4.7 percent), and Bank of America, N.A. (4.1 percent).

Chase ranked second in small loans to businesses with a 11.5 percent market share. There are 207 lenders in the CSA. Other major lenders in the market were primarily nationwide credit card lenders with significant small business portfolios and include American Express National Bank (28.3 percent), Bank of America, N.A. (11.1 percent), and Wells Fargo Bank, N.A. (9.9 percent).

Chase ranked second in small loans to farms 26.2 percent market share. There are 30 lenders in the CSA. The other major lenders in the market are Wells Fargo Bank, N.A. (27.5 percent), and Bank of America, N.A. (10.2 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 Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.3 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (917 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.

- Between 2017 and 2019, the proportion of loans in low-income areas was near to the proportion of OOU's in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income areas was respectively near to and below the proportion of OOU's in those geographies and the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. The proportion of loans in low-income geographies is well below the proportion of OOU's in those geographies, and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies is below the proportion of OOU's but exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses is adequate. The following information was taken into consideration when determining this rating.

- The small proportion of businesses in low-income geographies (5.9 percent) and competition between 207 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income geographies was below both the proportion of small businesses in those areas and the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was consistent with 2017 to 2019. The proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of small businesses in those areas and below the aggregate distribution of loans in low-income geographies, and near to the aggregate distribution in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies, (3.8 percent) and constrained lending opportunities were noted; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.

- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during 2017 to 2019 period. The proportion of loans to small farms in low-income geographies exceeded both the proportion of farms in those geographies and the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loans originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was exceeded the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of small loans to businesses by revenue code is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 11 CD loans in the AA for a total of \$334.7 million. This represents 45.3 percent of the tier 1 capital allocated to the AA. The bank's CD loans were responsive to identified community needs with 51.9 percent and 45.9 percent of the lending supporting community services and revitalization efforts, respectively.

Examples of CD loans include:

- In February 2014, Chase originated a \$62.5 million loan to the Douglas County School System, which is a region that primarily serves low- and moderate-income students. Fifty nine percent of the school district's student population is eligible for the Federal Free or Reduced Lunch program based on information from the National Center for Education Statistics (NCES).
- In October 2016, Chase originated a \$10.4 million construction loan used to revitalize the downtown area of the City of Lithonia. The project is in a moderate-income census tract and was part of the city's comprehensive revitalization plan. The funds helped to clean up a site that was previously designated a brownfield due to contamination and newly constructed 75 affordable apartment units for LMI families.
- In April 2017, Chase originated a \$97.3 million loan to the Gwinnett County Board of Education, which is responsible for the school district's curriculum, academic intervention, school improvements, and capital projects. Approximately 54 percent of the school district's student population is eligible for the Federal Free or Reduced Lunch program (NCES).

Other Loan Data

In November 2016, Chase provided a \$19.1 million letter of credit to a limited partnership. This financing will provide construction period credit enhancement for bonds being issued by the Housing Authority of the City of Augusta, Georgia. Proceeds of the bonds will be the primary source of construction financing for the new construction of 240 units of affordable housing for families in Augusta. All of which will be affordable to families earning 60 percent or less of the AMI. The project also received \$16.1 million in LIHTC equity.

Product Innovation and Flexibility

The bank makes extensive use innovative and/or flexible lending practices to serve AA credit needs. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

The bank funded 10,207 loans totaling \$1.5 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	1,067	192,461
FHA	4,472	606,245
HARP	2,704	349,009
VA	921	208,133
SBA	240	70,971
USDA	803	106,992

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-scope Review

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

The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments represent 23.6 percent of allocated tier 1 capital. A significant majority, or 91.6 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including affordable housing, economic development, and community service. Current period investments represent 89.7 percent affordable housing, 5.5 percent community service, 2.8 percent economic development and 2.0 percent revitalization/stabilization. Affordable housing represents 99.8 percent of prior period investments. Current and prior period investments created or retained 7,005 affordable housing units for low- and moderate-income individuals and families. Twenty-eight grants totaling \$6.4 million were provided to a variety of organizations for community service, affordable housing, and economic development.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. Sixteen prior and current complex investments, represent 33.1 percent of total investments, including six Direct Investor LIHTC transactions which require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. The bank also made three NMTC investments. Three investments or 6.7 percent of qualified CD investments were catalysts for change and will encourage future growth and other improvements.

Examples of CD Investments in the AA include:

- The bank originated a \$31.1 million LIHTC equity investment for new construction of a 240-unit development in Stonecrest, GA. All unit rents are set at 60 percent AMI. The bank will manage the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- The bank originated a \$14.7 million LIHTC equity investment for new construction of senior apartments in Atlanta, GA. The project consists of 180 units restricted to households earning at or below 60 percent AMI. Sixty-five (36 percent) of the units will be subsidized with a HUD HAP Section 8 contract. The project is required to provide four supportive services from three categories including social/recreational programs, on-site enrichment classes, and on-site health classes.

Qualified Investments – State of Georgia										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Atlanta-Athens-Clarke County-Sandy Springs CSA	34	14,631	50	159,897	84	45.9	174,528	47.7	0	0
Other:										
Statewide Investment with Purpose, Mandate, or Function (P/M/F) to Serve AAs	2	824	59	184,124	61	33.3	184,947	50.6	0	0
Statewide Investment with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	32	4,605	6	1,480	38	20.8	6,085	1.7	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.

Statewide Investments in State of Georgia

The bank has qualified investments with and without P/M/F to serve the AA in the state of Georgia. Investments with a P/M/F included affordable housing and community services. Seven investments or \$47.2 million were complex consisting of Direct Investor LIHTCs and NMTCs transactions. Four investments were a catalyst for change and will encourage future growth and other improvements. Current period affordable housing investments created 2,501 housing units for low- and moderate-income families and individuals. The bank made 23 grants or \$2.8 million to a variety of community service organizations primarily providing financial education services. In some instances, grants were provided in multiple years.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively well below and is near to the percentage of the population. The distribution was augmented by one MUI tract branch that serves low-income tracts and 11 MUI tract branches that serve moderate-income tracts. Examiners reviewed data

on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Atlanta CSA	100	86	100	3.5	18.6	25.6	52.3	7.9	23.0	32.5	36.2

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 247 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 13.3 percent over the prior rating period to 10 (4.0 percent) deposit-taking ATMs in low-income geographies and 41 (16.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Atlanta CSA	15	9	-2	-1	+2	+7

To the extent changes have been made, the bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch in a moderate-income area and closed two branches each in each low- and moderate-income geographies. Branch closures were due to reduced customer usage. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA. Twelve branches in reasonable proximity provided services to individuals in the low-and moderate-income geographies with branch closures.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm.

Community Development Services

The bank was a leader in providing CD services that were responsive to AA needs.

Bank employees provided their financial, job-specific expertise, and/or technical assistance for 750 CD service activities to 10 organizations since the last evaluation, logging a total of over 3,200 qualified hours. All assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were responsive to the community needs in the AA, particularly affordable housing. The following are examples of CD services provided:

- Three bank employees provided 370 homebuyer education activities to low- and moderate-income bank customers benefitting 1,000 low- and moderate-income customers.
- Eight bank employees provided 99 technical assistance activities to a local nonprofit whose mission is advancing low- and moderate-income individuals to economic self-sufficiency through employment.

State Rating

State of Idaho

CRA rating for the State of Idaho¹⁴: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- Overall good geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- No CD loans were made, which has a negative effect on the Lending Test rating.
- The use of flexible products did not affect the rating.
- An adequate level of qualified investments that displayed excellent responsiveness to credit and community economic development needs and an adequate level of broader statewide investments.
- Retail service delivery systems are readily accessible to geographies and individuals of different income levels.
- An adequate level of CD services in the full-scope AA.

Description of Institution's Operations in Idaho

The state of Idaho is Chase's 26th largest rating area based on aggregate deposits of \$1.1 billion, representing less than 0.1 percent of the bank's total deposits. As of December 31, 2019, the bank operated 20 branches and 30 deposit-taking ATMs within the rating area, representing 0.4 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$1.8 billion in loans or 3.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 29 banks operating 469 branches in the state of Idaho. Chase ranked ninth in deposit market share with 4.1 percent. Major competitors in the state based on deposit market share are include Wells Fargo Bank, N.A. (20.7 percent), U.S. Bank, N.A. (17.3 percent), and KeyBank (6.9 percent).

Chase has six AAs in the state of Idaho and the Boise City-Mountain Home-Ontario, ID-OR CSA received a full-scope review (Boise City MSA). The Idaho Falls MSA, Coeur d'Alene MSA, Pocatello MSA, Twin Falls MSA, and Idaho Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

¹⁴ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Boise City MSA. Table A indicates that the volume of OOUs is very small in low-income CTs (1.5 percent) and over 18.9 percent of families in the AA are low-income, with 10.0 percent below the poverty level. The median housing value in the Boise City MSA is four times the median income. 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.

In the Boise City MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$30,861 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$95,892 mortgage loan with a payment of \$926 per month; a moderate-income borrower earning \$49,378 per year (or less than 80 percent of the FFIEC adjusted median family income in the MSA) could afford a \$184,153 mortgage loan with a payment of \$1,481 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 147 Boise City MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	88	6.8	28.4	37.5	27.3	0.0
Population by Geography	616,422	3.6	26.4	44.8	25.2	0.0
Housing Units by Geography	235,712	4.2	26.7	43.8	25.3	0.0
Owner-Occupied Units by Geography	151,060	1.5	22.2	46.4	29.9	0.0
Occupied Rental Units by Geography	72,033	8.9	35.5	39.4	16.1	0.0
Vacant Units by Geography	12,619	9.5	29.8	37.6	23.2	0.0
Businesses by Geography	57,620	9.8	23.0	37.4	29.9	0.0
Farms by Geography	2,179	4.3	22.9	46.9	26.0	0.0
Family Distribution by Income Level	152,134	18.9	18.6	21.8	40.7	0.0
Household Distribution by Income Level	223,093	22.5	16.6	18.9	42.0	0.0
Median Family Income MSA – 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$174,922
			Median Gross Rent			\$843
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the Moody's Analytics November 2019 report, the Boise City area has above-average population growth and favorable migration flows. The area has cheaper living costs and lower business

costs compared to other large west coast metro areas. The labor force has seen strong growth. Per capita income growth that is 20.0 percent above average is driving year-over-year house price appreciation of 2.5 times the U.S. rate. The area is becoming a prime retirement destination for those escaping spiraling costs in other West Coast metro areas. The inflow of new residents boosts economic activity but also harms the area's income distribution as more affluent individuals relocate to the area. The area's housing market is one of the hottest in the U.S. and housing affordability has fallen to 20 percent below average since 2016. Low-wage workers, who make up a significant portion of the labor force are being priced out of the area. Income inequality in the area, though still lower than average, has risen faster since 2009 than nationally. Major employment industries in the area include professional and business services; education and health services; and government. Major employers in the area include St. Luke's Health System; Micron Technology Inc.; Boise State University; and St. Alphonsus Regional Medical Center.

Community Contacts

Examiners considered two community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on affordable housing and small business. According to the contacts the local economy is doing well. The area has seen an influx of people from California and Seattle, Washington locating to the Boise City area as the housing is more affordable. However, available housing is in short supply. Contacts noted that West Boise/Garden City has a lot of manufacturing/industrial companies with an opportunity for housing developments and other revitalization efforts. Contacts noted that there are numerous opportunities for banks to help address credit and community development needs by offering affordable housing for low-income households, flexible loan programs for first time homebuyers, financial coaching and counseling, loans for businesses, including equipment loans, equity/debt loans for operational expenses, and inventory loans and financing and technical assistance for small businesses that are not yet bankable.

Scope of Evaluation in Idaho

The Boise City MSA received a full-scope review. The MSA accounts for 74.6 percent of the bank's deposits and 66.2 percent of the lending in Idaho. The other five AAs received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IDAHO

LENDING TEST

The bank's performance under the Lending Test in the state of Idaho is rated High Satisfactory.

Performance in AAs receiving limited-scope reviews was factored together with performance from the full-scope AA to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boise City MSA is good. Overall, lending

levels, geographic and borrower distribution of loans were good. No CD loans were made, which had a negative effect. The use of flexible products did not affect the rating.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the bank's AA.

Examiners considered the number and dollar amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.3 percent and 67.0 percent of the loan volume in the state by number and 88.8 percent and 10.9 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farms loans represented 1.6 percent of the loan volume in the state by number 0.2 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Boise City MSA	4,427	9,992	221	0	14,640	66.2	74.6
Idaho Falls MSA	443	1,395	24	0	1,862	8.4	7.6
Coeur d'Alene MSA	1,289	1,815	22	0	3,126	14.1	7.1
Twin Falls MSA	109	428	48	0	585	2.7	2.6
Pocatello MSA	278	590	9	0	877	4.0	1.9
Idaho Non-MSA	384	606	21	0	1,011	4.6	6.2
Total	6930	14,826	359	0	22,115	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Boise City MSA	1,056,997	132,906	2,694	0	1,192,597	67.6	74.6
Idaho Falls MSA	72,434	17,492	282	0	90,208	5.1	7.6
Coeur d'Alene MSA	320,433	21,490	252	0	342,175	19.4	7.1
Twin Falls MSA	19,195	5,509	480	0	25,184	1.4	2.6
Pocatello MSA	38,378	6,531	79	0	44,988	2.5	1.9
Idaho Non-MSA	60,588	9,369	300	0	70,257	4.0	6.2
Total	1,568,025	193,297	4,087	0	1,765,409	100	100

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

Chase ranked fifth in deposits in the AA of 21 institutions with 7.0 percent market share.

In overall home mortgage lending, Chase ranked ninth with 2.2 percent market share. This is a very competitive market with 387 mortgage lenders. The top lenders in this market were Idaho Central (17.0 percent), Wells Fargo Bank, N.A. (5.1 percent), and Fairway Independent Mortgage (4.9 percent).

Chase ranked first in small loans to businesses with 17.6 percent market share. There are 81 lenders in the MSA. Other major lenders in the market are U.S. Bank, N.A. (12.9 percent) and American Express National Bank (12.7 percent).

Chase ranked third in small loans to farms 16.1 percent market share. There are 19 lenders in the MSA. Other major lenders in the market are Columbia State Bank (18.8 percent), U.S. Bank, N.A. (16.6 percent) and Wells Fargo Bank, N.A. (15.2 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 Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is good. The following information was taken into consideration when determining this rating.

- Performance in the moderate-income areas was given more significance as there was a small percentage of low-income geographies in both time periods (2.3 percent between 2014 and 2016 and 6.8 percent between 2017 and 2019).
- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas exceeded and met the percentage of OOU's and aggregate distribution of loans.
- Performance in the low- and moderate-income geographies between 2014 and 2016 was inconsistent with the performance during the 2017-2019 period. The bank did not make any loans in low-income geographies and the moderate-income performance was well-below the percentage of OOU's and below the aggregate distribution of loans. The weaker performance between 2014 and 2016 did affect the excellent performance during 2017-2019.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas was below both the percentage of small businesses and the aggregate distribution of loans.
- Performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. Between 2014 and 2016, the proportion of loans to small businesses in low- and moderate-income areas was well-below the percentage of small businesses located in those geographies and below the aggregate distribution of loans.
- Consideration was given to demographic evidence that only one percent of businesses were in low-income geographies during the 2014 to 2016. As a result, weaker performance in low- and

moderate-income areas during this period for geographic distribution did not affect the overall adequate performance.

Small Loans to Farms

Refer to Table S in the state of Idaho 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (4.3 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The high level of competition in the AA (19 lenders) and the fact that farm lending is not a focus of the bank was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank did not make any small farms loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies was below both the proportion of farms in those geographies and the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with the performance during 2017 to 2019 period. Between 2014 and 2016, the bank did not make any small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and near to the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 state of Idaho section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loans originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Profile data indicates housing affordability was a challenge for low- and moderate-income borrowers.
- Greater significance was placed on lending performance to moderate-income borrowers due to the challenges limiting opportunities in lending to low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well-below the percentage of low-income families in the AA and significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was significantly exceeded both the percentage of moderate-income families in the AA and the aggregate distribution of loans.
- Performance in low-income geographies between 2014 and 2016 was consistent with 2017 to 2019. Between 2014 and 2016, the proportion of loans to low-income borrowers was well-below the percentage of low-income families in the AA and significantly exceeded the aggregate distribution of loans. Between 2014 and 2016, the moderate-income performance was weaker than 2017 to 2019. The proportion of loans to moderate-income borrowers was near to the percentage of moderate-income families in the AA and well-below the aggregate distribution of loans. The performance in the 2014-2016 period had no effect on the overall good lending performance.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of small loans to businesses with revenues of \$1 million or less is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- Performance against both the aggregate and borrower distribution in 2014 through 2016 were consistent with 2017-2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Idaho 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank’s percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank’s performance was consistent with performance between 2017 and 2019. The bank’s percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Community Development Lending

The bank did not originate any CD loans during the evaluation period.

While the bank was unable to make any CD loans during the period, the bank continued to meet the needs of the low- and moderate-income individuals and geographies in Boise City MSA through qualified CD investments and service activities.

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

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices to serve credit needs in each of the full-scope AA reviewed. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

The bank funded 1,033 loans totaling \$257.2 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000’s)
DreaMaker	105	19,298
FHA	222	33,723
HARP	378	50,941
VA	212	48,206
SBA	22	3,584
USDA	94	101,401

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state’s overall Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on the lending scope reviews, the bank’s performance under the Lending Test in the Idaho Falls MSA and Coeur d’Alene MSA is consistent with the bank’s overall good performance under the Lending Test in the full-scope area. The bank’s performance under the Lending Test in the Pocatello MSA, Twin Falls MSA, and Idaho Non-MSA is weaker than the bank’s overall good performance due to weaker geographic and borrower income distribution performance.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Idaho is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boise City MSA is adequate.

The bank has an adequate level of qualified CD investments and grants, but rarely in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period qualified investments represent 3.2 percent of tier 1 capital allocated to the AA. Majority, or 99.9 percent of total investment represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs, including affordable housing and community services. One direct investment of \$3.2 million focused on affordable housing, which is a primary community development need in the AA. Fourteen grants totaled \$350,000, with 57.1 percent and 42.9 percent supporting community services and affordable housing, respectively. The prior period investment relates to an investment in a LIHTC fund that supports affordable rental housing.

Examples of CD Investments in the AA include:

- The bank provided a \$3.2 million LIHTC investment that contributed to the creation of 98 affordable housing units.
- The bank provided a \$45,000 grant to a partnership for their career learning and workforce program. Per the organization, 100 percent of those targeted or to benefit from the program are low- and moderate-income individuals. The planning process for the workforce development program was establishing strategies and leveraging unique knowledge and resources of various cross sector leaders to achieve targeted career readiness outcomes for young adults. The bank's funding played a critical role for the program by supporting the planning process to establish a shared agenda.

The bank did not use innovative and/or complex investments to support CD initiatives.

Qualified Investments – State of Idaho										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Boise City-Mountain Home-Ontario CSA	1	14	15	3,419	16	35.56	3,433	31.21	0	0
Limited Review:										
Idaho Fall-Rexburg-Blackfoot CSA	1	25	0	0	1	2.22	25	0.23	0	0
Pocatello MSA	1	88	1	5	2	4.44	93	0.84	0	0
Spokane-Spokane Valley-Coeur d'Alene CSA	8	3,528	0	0	8	17.78	3,528	32.07	0	0
Twin Falls MSA	0	0	1	10	1	2.22	10	0.09	0	0
ID Non-Metro AA	2	1	0	0	2	4.44	1	0.01	0	0
Other:										
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	9	3,415	9	20.00	3,415	31.05	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	6	494	0	0	6	13.33	494	4.49	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.

Statewide Investments in the State of Idaho

The bank has 15 current and prior period investments with and without a P/M/F to serve AAs in the state of Idaho. These broader statewide investments represent 36 percent of total amount of state investments. Eighty-seven percent of the total amount have a P/M/F to serve AAs in Idaho. The CD investments support community service and affordable housing. The investments in the broader statewide area support the bank's otherwise adequate performance under the Investment Test in the state of Idaho.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Low Satisfactory Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Pocatello MSA is consistent with the bank's overall adequate performance in the full-scope area. The bank's performance in the Coeur d'Alene CSA is stronger than the bank's overall adequate performance in the full-scope area due primarily to a higher volume of prior period CD investments. The bank's performance under the Investment Test in the Idaho Falls CSA, Twin Falls MSA, and the combined Idaho Non-Metro AA is weaker than the bank's overall adequate performance in the full-scope area due to a lower volume of qualified investments.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution exceeds the percentage of the population in these respective geographies. The bank had two branches in low-income geographies and four branches in moderate-income geographies.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Boise City MSA	74.6	13	65.0	15.4	30.8	23.1	30.8	3.6	26.4	44.8	25.2

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

Alternative delivery systems generally enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 19 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 33.3 percent over the prior rating period to three (15.8 percent) deposit-taking ATMs in low-income geographies and five (26.3 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed negligible changes in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boise City 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 low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not close or open any branches in low-income geographies. The bank closed one branch in a moderate-income geography. The branch closure was due to reduced customer usage and unprofitability. Despite the branch closure, branch locations in general, remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank had an adequate level of CD services in the full-scope AA.

Bank records showed employees provided technical assistance and/or job-specific expertise for 87 CD service activities to six organizations for a total of 382 qualified hours of service. A majority of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. These services were responsive to community needs, particularly for affordable housing. The following is an example of CD services provided in this AA:

- Two bank employees provided 147 hours of first-time home purchase seminars benefitting 505 low- and moderate-income individuals. The employees provided information on mortgage products, services, and programs targeting low-to moderate-income homebuyers.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Idaho Falls-Rexburg-Blackfoot and Coeur d'Alene AAs is consistent with the bank's overall performance under the Service Test in the full-scope area and the bank's performance under the Service Test in the Pocatello; Twin Falls; and Idaho non-metropolitan AAs is weaker than the bank's overall performance under the Service Test in the full-scope area due to lower percentage of branch distribution in low- and moderate-income geographies.

State Rating

State of Illinois

CRA rating for the State of Illinois¹⁵: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- Overall good geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, the extensive use of flexible products, and stronger performance in the limited-scope areas, positively affected the rating.
- A significantly positive impact on investment activity by the limited-scope AAs as well as a significant level of broader statewide investments with a purpose, function, or mandate to serve AAs.
- Retail service delivery systems reasonably accessible to geographies and individuals of different income levels.
- An adequate level of CD services in the full-scope AA.

Description of Institution's Operations in Illinois

The state of Illinois is Chase's 21st largest rating area based on aggregate deposits of \$3.1 billion, representing 0.2 percent of the bank's total deposits. As of December 31, 2019, the bank operated 18 branches and 54 deposit-taking ATMs within the rating area, representing 0.3 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$1.1 billion in loans or 0.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 351 banks operating 1,837 branches in the state (excludes deposits and offices in the Chicago CSA, which is evaluated separately in the PE). Chase ranked fourth in deposit market share with 3.1 percent. Major competitors in the state based on deposit market share are State Farm FSB (10.6 percent), Busey Bank (4.0 percent), and PNC Bank, N.A. (3.1 percent).

Chase has six AAs in the state of Illinois and the Campaign-Urbana, IL MSA received a full-scope review (Champaign MSA). The Davenport-Moline, IL MSA, Peoria MSA, Rockford-MSA, Bloomington MSA, and Springfield MSA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

¹⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Champaign MSA. Table A indicates that the volume of OOUs is very small in low-income CTs (4.9 percent) and over 21.8 percent of families in the AA are low-income, with 9.9 percent below the poverty level. The median housing value in the Champaign MSA is five times the median family income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Champaign MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,317 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$117,114 mortgage loan with a payment of \$1,059 per month; a moderate-income borrower earning \$56,507 per year (or less than 80 percent of the FFIEC adjusted median family income in the MSA) could afford a \$218,130 mortgage loan with a payment of \$1,695 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Champaign-Urbana IL MSA 2017-20219						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	17.0	14.9	42.6	21.3	4.3
Population by Geography	222,261	13.2	15.5	45.0	21.3	5.0
Housing Units by Geography	96,302	13.9	16.2	47.9	20.1	1.8
Owner-Occupied Units by Geography	49,446	4.9	10.8	58.1	26.1	0.1
Occupied Rental Units by Geography	37,111	24.7	22.4	35.5	13.5	3.9
Vacant Units by Geography	9,745	19.3	20.5	43.2	14.9	2.1
Businesses by Geography	11,949	10.1	17.3	41.9	28.1	2.6
Farms by Geography	722	2.8	5.3	71.2	20.8	0.0
Family Distribution by Income Level	47,285	21.8	16.5	20.7	41.0	0.0
Household Distribution by Income Level	86,557	27.6	14.5	15.2	42.7	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA		\$70,634	Median Housing Value			\$137,205
			Median Gross Rent			\$835
			Families Below Poverty Level			9.9%

*Source: 2015 ACS and 2019 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.*

Economic Data

According to the Moody's Analytics February 2020 report, the Champaign MSA area economy is stable for now due to few dynamic growth drivers. The economy is driven by the presence of the University of

Illinois and agriculture. Some other positives include low business costs especially office rents, a comparatively large pool of talent and good prospects for life sciences and information technology. Most recently, there was a surge of job additions at the University of Illinois. The unemployment rate is at a 20 year low of 3.3 percent. Further, average earnings in the private sector have risen over the past year at one of the fastest rates in the country. While the area is highly dependent on state government for jobs and income, the University of Illinois flagship campus relies less on state funding than the state's other public universities and boasts ample liquidity, a below average debt burden and strong student demand. These advantages have allowed the university to steadily add faculty and staff to keep up with the growing student body. The top three employers in the area include the University of Illinois, The Carle Foundation, and Kraft Foods Inc. The housing market is a mixed bag. Multifamily housing is propping up residential construction. Builders put up more apartment units in 2019 than in all but two other years since records have been kept. Single-family starts remain sluggish, and house price increases have lost their edge over the state.

Community Contacts

Examiners considered five community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on affordable housing, business start-up, and economic development/small business. Contacts indicated that the area maintains a high standard of living with the benefit of low housing prices in comparison to other growing communities in the nation. However, some low-income families have issues obtaining loans due to credit issues. Contacts noted that there is a shortage of commercial space which has driven up the value and as a result makes space more expensive and more difficult for a start-up business. Contacts identified a need for affordable housing, gap funding for start-ups and other small businesses, funding for younger entrepreneurs with limited credit history. Contacts noted that there are opportunities for banks to lend to projects being originated locally. In addition, there are opportunities for banks to support community development activities and financing programs.

Scope of Evaluation in Illinois

The Champaign MSA received a full-scope review. The MSA accounts for 24.8 percent of the deposits and 18.6 percent of the lending in Illinois. The remaining five AAs received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discuss at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the Lending Test in the state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Champaign MSA is good. Overall, good lending levels and good geographic and borrower distribution of loans.

Lending Activity

Lending levels reflect good responsiveness to the credit needs in the bank's AA.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 27.5 percent and 70.0 percent of the loan volume in the state by number and 66.3 percent and 27.2 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 2.4 percent of the loan volume in the state by number 0.6 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Champaign-Urbana MSA	982	2,523	77	3	3,585	18.6	24.8
Bloomington-Pontiac CSA	850	1,575	57	0	2,482	12.9	12.9
Davenport-Moline CSA	422	1,249	65	2	1,738	9.0	3.4
Peoria-Canton CSA	1,051	2,710	144	2	3,907	20.2	10.5
Rockford-Freeport-Rochelle CSA	1,562	3,557	52	2	5,173	26.8	23.2
Springfield-Jacksonville-Lincoln CSA	441	1,892	72	1	2,406	12.5	25.2
Total	5,308	13,506	467	10	19,291	100	100

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

Dollar Volume of Loans*(000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Champaign-Urbana MSA	143,136	39,374	664	20,966	204,140	18.6	24.8
Bloomington-Pontiac CSA	149,827	29,183	471	0	179,481	16.3	12.9
Davenport-Moline CSA	43,977	28,152	512	17,045	89,686	8.2	3.4
Peoria-Canton CSA	146,855	61,120	1,980	11,600	221,555	20.2	10.5
Rockford-Freeport-Rochelle CSA	190,331	92,186	399	12,756	295,672	26.9	23.2
Springfield-Jacksonville-Lincoln CSA	55,073	48,714	2,992	2,000	108,779	9.9	25.2
Total	729,199	298,729	7,018	64,367	1,099,313	100	100

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

Chase ranked second in deposits of 30 institutions with 12.8 percent market share.

In overall home mortgage lending, Chase ranked ninth with 2.8 percent market share. This is a very competitive market with 265 mortgage lenders. The top three lenders in this market share are Busey Bank (16.8 percent), Prime Lending (6.7 percent), and Wells Fargo Bank, N.A. (4.7 percent).

Chase ranked first in small loans to businesses with 20.7 percent market share. There are 69 lenders in the MSA. Other major lenders in the market were primarily American Express National Bank (13.8 percent), U.S. Bank, N.A. (8.1 percent), and Capital One, N.A. (6.2 percent).

Chase ranked sixth in small loans to farms 4.7 percent market share. There are 22 lenders in the MSA. The other major lenders in the market are John Deere Financial, F.S.B (30.5 percent), First Mid Bank & Trust, NA (16.3 percent), and Busey Bank (13.6 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 Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Profile data indicates there is a limited proportion of OOU's available as well as a high level of vacant units in low-income geographies.
- Performance in the moderate-income areas was given more significance as there was a small percentage of low-income geographies in both time periods (2.0 percent between 2014 and 2016 and 4.9 percent between 2017 and 2019).
- Between 2017 and 2019, the proportion of loans in low-income geographies was below both the proportion of OOU's in those areas and the aggregate distribution of loans. The proportion of moderate-income geographies significantly exceeded both the proportion of OOU's in those areas and the aggregate distribution of loans.
- Performance in the low- and moderate-income geographies between 2014 and 2016 was inconsistent with the performance during the 2017-2019 period. Between 2014 and 2016, the proportion of loans in low-income geographies was significantly below both the proportion of OOU's in those areas and the aggregate distribution of loans. The proportion of moderate-income geographies was below the proportion of OOU's in those areas and significantly exceeded the aggregate distribution of loans. The weaker performance between 2014 and 2016 did affect the 2017-2019 performance.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The economic growth of 2.1 percent was much slower than the national rate of 3.4 percent, with population decline in the AA.
- Between 2017-2019, the proportion of loans to small businesses in low-income geographies was near to the proportion of businesses in those area and equaled the aggregate distribution of loans. The proportion of loans to small businesses in moderate-income geographies was below both the proportion of businesses in those area and the aggregate distribution of loans.
- Performance in low- and moderate-income geographies during the 2014 and 2016 time period was stronger than 2017 to 2019. Between 2104 and 2016, the proportion of loans to small businesses in low-income geographies exceeded both the proportion of businesses in those area and the aggregate distribution of loans. The proportion of loans to small businesses in moderate-income geographies was below the proportion of businesses in those area and near to aggregate distribution of loans.

Small Loans to Farms

Refer to Table S in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (2.8 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Farm lending is not a focus of the bank, therefore examiners placed greater significance on performance compared to aggregate of lender. Chase ranked sixth in deposit market share with 4.7 percent amongst the high level of competition in the AA (22 lenders).
- Between 2017 and 2019, the bank did not make any small farm loans in low- and moderate-income geographies.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with the performance during 2017 to 2019 period. Between 2014 and 2016, the bank did not make any small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was significantly below both the proportion of farms in those geographies and the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the bank.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Competition is high relative to the market size.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families in the AA and below the aggregate distribution of loans. The proportion of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families in the AA and was near to the aggregate distribution of loans.
- Performance between 2014 and 2016 was stronger than the 2017-2019 period, which contributed to the overall good performance. The proportion of loans to low-income borrowers significantly exceeded the aggregate distribution but was below the proportion of low-income families. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is excellent. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's distribution of loans to businesses with revenues of \$1 million or less was near to the proportion of businesses with revenues of \$1 million or less and significantly exceeded the aggregate distribution of loans.
- Performance in the 2014 to 2016 period was consistent with the performance between 2017-2019. The bank's distribution of loans to businesses with revenues of \$1 million or was near to the proportion of businesses and significantly exceeded the aggregate distribution of loans.

Small Loans to Farms

Refer to Table T in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was generally consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made three CD loans totaling \$21 million. This dollar volume represented 21.2 percent of the tier 1 capital allocated to the AA. A substantial majority of the loans were used for affordable housing while the remaining supported community service, which are both community needs.

Examples of CD loans in the AA include:

- In February 2016, Chase originated a \$3.2 million loan to a school district. Sixty-nine percent of the students are eligible for the Federal Free or Reduced Lunch program.
- In November 2016, Chase provided a \$4.8 million loan for the new construction of an apartment building in a middle-income census tract in Urbana, IL. The project created 33 low- and moderate-income units, with 24 leased under Section 8 contracts and the remainder leased under a Project-based Veterans Affairs Supportive Housing contract.
- In December 2018, Chase funded a \$13 million construction bond loan with proceeds used to finance new construction of a 122-unit senior housing project in Champaign, IL. Eligibility for 120 units is dependent upon low- and moderate-income qualification guidelines and the remaining two are market rate. Twenty-four of these units will also be supportive housing units with the Housing Authority providing two full-time case managers to coordinate service delivery.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. As outlined below, a total of 424 loans were funded totaling \$49.3 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	49	6,977
FHA	58	7,053
HARP	21	1,911
VA	30	5,080
SBA	8	498
USDA	258	27,800

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AA was factored into the state's overall High Satisfactory Lending Test rating and did not change the initial overall conclusions based on the AA receiving the full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Davenport-Moline IL MSA, Peoria MSA, and Rockford-MSA is consistent with the bank's overall good performance under the Lending Test in the full-scope AA. The bank's performance under the Lending Test in the Bloomington MSA and Springfield MSA is weaker than the bank's overall good performance due to a weaker borrower income distribution. The weaker performance did not affect the overall Lending Test rating for the state of Illinois.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Illinois is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Champaign-Urbana MSA is poor. Performance in the limited-scope AAs had a significantly positive effect on the overall Investment Test rating.

The bank has a poor level of qualified CD investments or grants, but not in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments represent 0.8 percent of allocated tier 1 capital allocated to the AA. Nearly all the investments represent prior period investments.

The bank exhibits poor responsiveness to credit and community economic development needs. Identified credit needs are affordable housing, affordable rental housing, and economic and workforce development. While there were no CD investments, the bank made one current period grant totaling \$30.0 thousand or 3.8 percent of qualified investments, which supported affordable housing. Current and prior period affordable housing investments created or retained 221 low- and moderate-income housing units for individuals and families.

The bank rarely uses innovative and/or complex investments to support CD initiatives. One prior period investment made in 2009 totaling \$749.7 thousand was a Direct Investor LIHTC transaction which required bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance.

Number and Amount of Qualified Investments

Qualified Investments – State of Illinois										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Champaign-Urbana MSA	3	764	1	30	4	3.1	794	.6	0	0
Limited Review:										
Bloomington-Pontiac CSA	3	81	1	5,855	4	3.1	5,936	4.6	0	0
Davenport-Moline CSA	3	220	2	14,543	5	3.9	14,763	11.4	0	0
Peoria-Canton CSA	7	4.21	10	11,457	17	13.4	15,667	12.1	0	0
Rockford-Freeport-Rochelle CSA	2	113	6	10,290	8	6.3	10,403	8.1	0	0
Springfield-Jacksonville-Lincoln CSA	2	135	9	7,992	11	8.7	8,126	6.3	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	6	196	51	61,884	57	44.9	62,080	48.0	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	21	11,490	0	0	21	16.5	11,490	8.9	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.

Examples of CD Investments in the AA include:

- The bank provided a \$30 thousand charitable contribution to a non-profit company through their participation in the bank's REO Community Revitalization Program. The company's mission is to revitalize low- and moderate-income communities by helping low- and moderate-income families become and remain homeowners. This is done by providing education, counseling, and development services that ensure each family has the knowledge, management skills, and fiscal discipline to create and execute the right financial plan.
- The bank pledged to help families in high need neighborhoods achieve and sustain homeownership, by donating or selling bank real estate owned properties to government agencies, municipalities, non-profit organizations, and land banks across the country.

Statewide Investments in State of Illinois

Statewide Investments with a P/M/F were primarily related to affordable housing, revitalization/stabilization, and community service. A significant majority or 99.7 percent of total investments represent current period investments. Responsiveness to identified community needs is excellent. Current and prior period affordable housing investments totaled \$50.8 million, with \$6.2 million for community service and \$4.9 million for revitalization/stabilization. Affordable housing investments created or retained 1,213 low- and moderate-income housing units for individuals and families. Investments included two complex Direct Investor LIHTC transactions which require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project

development and operations, and ensuring compliance. The bank also made one NMTC investment. Four investments were a catalyst for future growth and other improvements.

The bank made 29 grants totaling \$3.4 million to a variety of organizations supporting community service through consumer education. In some occurrences, grants were provided in multiple years. The level of investments had a positive impact on the Investment Test rating for the state of Illinois.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating and significantly changed the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington MSA, Davenport-Moline-Rock Island MSA, Peoria MSA, Rockford MSA and Springfield MSA is stronger than the bank's overall poor performance under the Investment Test in the full-scope area due to a higher level of qualified investments compared to allocated tier 1 capital. Performance in the limited-scope AAs had a significantly positive effect on the overall Investment Test rating for the state of Illinois.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is adequate. In low- and moderate-income geographies, the distribution is respectively significantly below and exceeds the percentage of the population. The bank had no branches in low-income geographies and one branch in moderate-income geographies. The distribution was augmented by two MUI tract branches that serve low-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Champaign MSA	24.8.	3	16.7	0	33.3	66.7	0	13.2	15.5	45.0	21.3

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

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 12 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank decreased the deposit-taking ATMs in low- and moderate-income geographies from the prior rating period to one (8.3 percent) deposit-taking ATMs in low-income geographies and three (25.0 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

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

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, the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the moderate-income geographies.

Community Development Services

The bank provides an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 46 CD service activities to two organizations for a total of 332 qualified hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The following is an example of CD services provided in this AA:

- A bank employee provided 190 hours of board service to a local Community Development Corporation

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Low Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Springfield, IL; Rockford, IL; Peoria, IL; Bloomington, IL; Davenport-Moline-Rock Island, IL AAs is consistent with the bank's overall performance under the Service Test in the full-scope area due to consistently weak branch distribution in low- and moderate-income geographies.

State Rating

State of Indiana

CRA rating for the State of Indiana¹⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- Overall adequate geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which had a significant positive affect on the rating.
- The extensive use of flexible products, which positively affected the rating.
- A good level of qualified investments, excellent responsiveness to credit and community economic development needs, significant use of complex investments, and the high level of investments in the broader statewide or regional area.
- Retail service delivery systems accessible to geographies and individuals of different income levels.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Indiana

The state of Indiana is Chase's 11th largest rating area based on aggregate deposits \$15.6 billion, representing 1.1 percent of the bank's total deposits. As of December 31, 2019, the bank operated 129 branches and 262 deposit-taking ATMs within the rating area, representing 2.6 percent of total branches and 1.6 percent of total ATMs. The bank originated and purchased approximately \$7.1 billion in loans or 1.0 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 144 banks operating 1,967 branches in the state of Indiana. Chase ranked first in deposit market share with 13.9 percent. Major competitors in the state based on deposit market share include PNC Bank, N.A. (7.83 percent), Fifth Third Bank (6.7 percent), and First Merchants Bank (5.4 percent).

Chase delineated six AAs in the state of Indiana. The Indianapolis-Carmel-Muncie, IN CSA (Indianapolis CSA) accounts for 72.0 percent of the bank's deposits in Indiana, received a full-scope review. The CSA consists of the Indianapolis-Carmel-Anderson, IN MSA, Muncie, IN MSA and Crawfordsville, IN MiSA. The Bloomington-Bedford CSA, Lafayette-West Lafayette MSA, Fort Wayne-Huntington-Auburn CSA, South Bend-Elkhart-Mishawaka CSA, and Indiana Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Indianapolis CSA. Table A indicates that the volume of OOU's is very small in low-

¹⁶ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

income CTs and over 21.5 percent of families in the AA are low-income with 10.7 percent below the poverty level. The median housing value in the Indianapolis CSA is three times the median income, two times the moderate-income and three times the low-income, indicating a limited proportion of OOUs are affordable to low-income borrowers. 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.

In the Indianapolis CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$25,968 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$72,555 mortgage loan with a payment of \$779 per month; a moderate-income borrower earning \$41,548 per year (or less than 80 percent of the FFIEC adjusted median family income in the CSA) could afford a \$146,801 mortgage loan with a payment of \$1,246 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Indianapolis-Carmel-Muncie IN CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	388	16.8	26.5	30.7	25.3	0.8
Population by Geography	1,923,240	10.7	21.9	31.5	35.3	0.6
Housing Units by Geography	817,792	12.3	23.9	30.8	32.6	0.4
Owner-Occupied Units by Geography	473,275	6.1	16.4	35.0	42.3	0.1
Occupied Rental Units by Geography	258,922	19.1	35.0	25.6	19.6	0.7
Vacant Units by Geography	85,595	26.2	31.7	23.0	18.4	0.7
Businesses by Geography	153,609	9.1	19.4	31.0	40.2	0.3
Farms by Geography	4,718	4.5	11.3	45.1	39.1	0.1
Family Distribution by Income Level	473,648	21.5	16.9	19.4	42.1	0.0
Household Distribution by Income Level	732,197	23.4	16.1	17.6	42.9	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$143,191
Median Family Income MSA - 34620 Muncie, IN MSA		\$51,935	Median Gross Rent			\$824
Median Family Income Non-MSAs - IN		\$55,715	Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics February 2020 Report, at just below 3 percent, the unemployment rate in Indianapolis is stable at a two-decade low and the labor force is at an all-time high. Average hourly earnings are up more in the area than they are nationwide over the past few years because of tight labor supplies and a rising concentration of high-wage jobs. The area's strengths include highly affordable

housing; strong demographics with positive net-migration; low cost of doing business; a growing high-tech hub; and a diversified industrial structure and well-developed distribution network. In November, Amazon broke ground on a fulfillment center in Hancock County, its second addition in the area in 2019. Major employment industries include education and health services; business and professional services; and government. Major employers in the area include Indiana University Health; St. Vincent Hospitals and Health Services; Lilly and Co.; and Community Health Network. The housing market has benefited from earlier job and income gains. Consistently a top Midwest performer in population growth, Indianapolis' economy is well positioned to outshine the region's in coming years. Much of the area's ability to buck the region's negative demographic patterns is tied to low costs for businesses and households. Construction activity will build off current momentum this year and next. While new supply will slow house price appreciation, the risk of a sharp deceleration as new supply comes online is low given above-average affordability and valuations that are anchored to underlying fundamentals.

Community Contacts

Examiners considered four community contacts completed during the review period with entities serving the area. Contacts were completed with organizations focused on affordable housing, economic development and community and social services. According to the contacts, public resources for affordable housing are limited and not adequate to meet community needs. Parts of the region are struggling to maintain their population. Disinvestment persists in the inner core of the cities. There continues to be persistent poverty in certain neighborhoods and communities. The opioid crisis is impacting many communities. Much of the workforce is undereducated and lacks the skills needed by local businesses. Other needs identified in the community include, financing to support the development of affordable housing, workforce housing to create neighborhood stability, funding support and capacity building for area non-profits that work directly with low- and moderate-income populations, affordable mortgages for low- to moderate-income residents, technical assistance and training for small businesses, including financial education, small dollar loans and start-up funds for small businesses and workforce development training to give low-income individuals access to better paying jobs.

Scope of Evaluation in Indiana

The Indianapolis CSA received a full-scope review. This CSA accounts for 72.0 percent of the deposits and 68.6 percent of the lending in Indiana. The remaining five AAs received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discuss at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

LENDING TEST

The bank's performance under the Lending Test in the state of Indiana is rated High Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Indianapolis CSA is good. Overall, good lending levels and good borrower distribution of loans with adequate geographic distribution of loans.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the bank's AA.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 37.2 percent and 61.2 percent of the loan volume in the state by number and 79.1 percent and 17.5 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 1.0 percent of the loan volume in the state by number and 0.6 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Indianapolis-Carmel-Muncie CSA	21,076	34,936	485	11	56,508	68.6	71.3
Bloomington-Bedford CSA	1,416	2,682	62	0	4,160	5.1	5.1
Fort Wayne-Huntington-Auburn CSA	4,015	5,912	71	0	9,998	12.1	8.9
Lafayette-West Lafayette-Frankfort CSA	1,209	2,048	109	5	3,371	4.1	5.6
South Bend-Elkhart-Mishawaka CSA	2,578	4,749	76	1	7,404	9.0	8.0
Indiana Non-MSA	340	559	31	0	930	1.1	1.2
Total	30,634	50,886	834	17	82,371	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Indianapolis-Carmel-Muncie CSA	3,775,506	804,416	31,724	186,374	4,798,020	67.7	71.3
Bloomington-Bedford CSA	223,490	62,906	1,124	0	287,520	4.1	5.1
Fort Wayne-Huntington-Auburn CSA	545,021	167,048	1,367	0	713,436	10.1	8.9
Lafayette-West Lafayette-Frankfort CSA	192,079	41,023	8,397	8,499	249,998	3.5	5.6
South Bend-Elkhart-Mishawaka CSA	841,450	154,548	2,263	0	998,261	14.1	8.0
Indiana Non-MSA	32,046	8,539	454	0	41,039	0.6	1.2
Total	5,609,592	1,238,480	45,329	194,873	7,088,274	100	100

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

Chase ranked first in deposits out of 48 institutions with 20.2 percent market share.

In overall home mortgage lending, Chase ranked first with 5.3 percent market share. This is a very competitive market with 636 home lenders and no single lender dominated the market. Other major lenders are Huntington National Bank (5.2 percent), Caliber Home Loans, Inc. (4.6 percent), and Wells Fargo Bank, N.A. (3.6 percent).

Chase ranked first in small loans to businesses with 23.1 percent market share. There are 147 lenders in the CSA. Other major lenders are American Express National Bank (15.3 percent), PNC Bank, N.A. (9.1 percent), and Capital One, N.A. (5.5 percent).

Chase ranked second in small loans to farms with 19.5 percent market share. There were 36 lenders in the CSA. Other major lenders and market share are John Deere Financial, F.S.B (21.7 percent), First Farmers Bank and Trust (11.8 percent) and First Merchants Bank (8.0 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (6.1 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (636 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was well-below the proportion of OOUs in those geographies and below aggregate distribution of loans. The proportion of loans in moderate-income areas was near to the proportion of OOUs in those geographies and exceeded the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. The proportion of loans in low-income geographies is significantly below the proportion of OOUs in those geographies and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was well-below the proportion of OOUs and near to the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- During the 2017 to 2019 period, the proportion of loans to small businesses in low- and moderate-income geographies was below both the proportion of businesses in those areas and the aggregate distribution of loans.
- The performance during the 2014 to 2016 time periods was inconsistent with 2017-2019. Between 2014 and 2016, the proportion of loans to small businesses in low-income areas was well-below both the percentage of small businesses located in those geographies and the aggregate distribution of loans. The proportion of loans to small businesses in moderate-income areas was below both the percentage of small businesses located in those geographies and the aggregate distribution of loans.

Small Loans to Farms

Refer to Table S in the state of Indiana 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (4.5 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Farm lending is not a focus of the bank, therefore examiners placed greater significance on performance compared to aggregate of lender. Chase ranked second in deposit market share with 21.7 percent amongst the high level of competition in the AA (36 lenders).
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was near to the proportion of farms in those geographies and significantly exceeded the aggregate distribution.
- Between 2017 and 2019, the bank did not make any loans to small farms in moderate-income geographies therefore the proportion of loans to small farms in moderate-income geographies was significantly below the proportion of farms in those geographies and the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was near to the proportion of farms in those geographies and significantly below the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was significantly below the proportion of farms in those geographies and significantly exceeded the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the bank.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well-below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was exceeded the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- Performance against both the aggregate and borrower distribution in 2014 through 2016 were consistent with 2017-2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Indiana 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of businesses and substantially exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.

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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 11 CD loans totaling \$186.4 million. This dollar volume represented 12.9 percent of the tier 1 capital allocated to the AA. Ten loans (90 percent) supported community services, while the remaining loan supported revitalization/stabilization and affordable housing.

Examples of CD loans include:

- In October 2016, the bank made a \$154.4 million loan to a school district that educates a student population where 71.8 percent are eligible for the Free and Reduced Lunch Program. The funds were used to implement a program of best practices in curriculum, academic intervention, and other school improvements.
- In November 2014, the bank provided \$6.4 million in funding towards constructing new affordable housing for senior citizens in Beech Grove, IN. The project includes 11 single-story buildings with a total of 60 units that are for low- and moderate-income seniors age 55 or older.
- In November 2017, the bank provided \$10.7 million in funding to develop 72 new affordable units in Muncie, IN. The project includes three properties with 23 two-bedroom units and 49 three-bedroom

units that are restricted to low- and moderate-income households. The project was considered a key component of neighborhood revitalization and clean-up of Muncie's south side.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. As outlined below, a total of 5,574 loans were funded totaling \$718.2 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	787	107,567
FHA	2,384	271,216
HARP	729	79,412
VA	696	119,526
SBA	189	44,864
USDA	789	95,617

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AA was factored into the state's overall High Satisfactory Lending Test rating and did not change the initial overall conclusions based on the AAs receiving the full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Bloomington-Bedford CSA, Lafayette-West Lafayette MSA, and Indiana Non-MSA is consistent with the bank's overall good performance under the Lending Test in the full-scope AA. Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Wayne-Huntington-Auburn CSA and South Bend-Elkhart-Mishawaka CSA is weaker than the bank's overall good performance in the full-scope AA. Performance is weaker primarily due to the lack of CD lending. Performance in limited-scope AAs did not affect the overall Lending Test rating for the state of Indiana.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Indiana is rated Outstanding. A good level of qualified investments was enhanced by excellent responsiveness to credit and community economic development needs, significant use of complex investments, and the high level of investments in the broader statewide or regional area.

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 5.0 percent of tier 1 capital allocated to the AA. Sixty-seven percent are current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA. Twenty-three current period CD investments totaling \$42.6 million are responsive to community development needs. Seventy-one percent support affordable housing, 23.1 percent support community services, and 6.1 percent support revitalization/stabilization. Seventy-five grants totaled \$6.0 million, with 48.3 percent, 34.0 percent, 12.7 percent, and 5.0 percent supporting community services, revitalization/stabilization, affordable housing, and economic development, respectively. Forty-two prior period CD investments totaling \$23.3 million are complex with nearly all supporting affordable housing. In addition, 21 current period investments supporting community services and revitalization/stabilization serve as catalysts to encourage future improvement and growth in the AA.

The bank makes significant use of complex investments to support CD initiatives. Eight current period CD investments totaling \$21.2 million were complex. Of those, 41.5 percent, 46.2 percent and 12.3 percent support affordable housing, community services and revitalization/stabilization, respectively. Nine of ten prior period complex investments or \$14.2 million, support affordable housing consisting of Direct Investment LIHTCs transactions.

Number and Amount of Qualified Investment

Qualified Investments – State of Indiana										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Indianapolis-Carmel-Muncie CSA	42	23,372	98	48,612	140	53.2	48.14	48.1	0	0
Limited Review:										
Bloomington-Bedford CSA	2	671	5	13,749	7	2.7	9.64	9.6	0	0
Fort Wayne-Huntington-Auburn CSA	11	1,285	15	6,589	26	9.9	5.27	5.2	0	0
Lafayette-West Lafayette-Frankfort CSA	2	64	2	5,608	4	1.5	3.79	3.8	0	0
South Bend-Elkhart-Mishawaka CSA	7	1,370	4	6,318	11	4.2	5.14	5.1	0	0
IN Non-Metro AA	3	7	0	0	03	1.1	7	0	0	0
Other:										
Statewide Investments with Purpose, Mandate or Function (P/M/F) to Serve AAs	0	0	47	33,612	47	17.9	33,612	22.5	0	0
Statewide Investments with No Purpose, Mandate or Function (P/M/F) to Serve AAs	24	8,242	1	30	25	9.5	8,272	5.5	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.

Examples of community development investments in the AA include:

- The bank originated a \$2.3 million NMTC equity investment for the construction of a 16,000 square foot (SF) grocery store, a 12,000 SF re-sale store, and 12,600 SF of additional retail space in Avondale Meadows within the city of Indianapolis. The facility was constructed in a community that is both low-income and a USDA-defined food desert. The bank's investment served as the catalyst to spark more development within this community and to attract businesses offering healthy

food options. The facility acted as a cornerstone business and supported over 100 full-time and part-time jobs in the area.

Statewide Investments in the State of Indiana

The bank has 72 current and prior period CD investments and grants with and without a P/M/F to serve AAs in the broader statewide or regional area. Ninety-eight percent supports affordable housing, and two percent supports community services. One small investment supports revitalization/stabilization. These broader statewide investments enhanced the bank's overall performance under the Investment Test in the state of Indiana.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Wayne-Huntington-Auburn CSA, South Bend-Elkhart-Mishawaka CSA, and Lafayette-West Lafayette CSA are consistent with the bank's overall good performance under the Investment Test in the full-scope area. Performance in the Bloomington-Bedford CSA is stronger than the bank's good performance in the full-scope area. Stronger performance is due to a high level of investments in relation to tier 1 capital. The bank's performance in the IN Non-Metro AA is weaker than the bank's performance in the full-scope area. Weaker performance is due to a very low level of investments. Performance in limited-scope AAs did not affect the overall Investment Test rating for the state of Indiana.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low-and moderate-income geographies, the distribution is respectively below and exceeds the percentage of the population. The bank had five branches in low-income geographies and 20 branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves low-income tracts and eleven MUI tract branches that serve moderate-income tracts. Examiners reviewed data on

the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Indianapolis -Carmel- Muncie CSA	72.0	69	69.7	7.2	29.0	30.4	33.3	10.7	21.9	31.5	35.3

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 184 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 30.4 percent over the prior rating period to 16 (8.7 percent) deposit-taking ATMs in low-income geographies and 57 (31.0 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
			Indianapolis-Carmel-Muncie CSA	1	20	-6

The bank's closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed six (50.0 percent) branches in low-income geographies and six (23.0 percent) branches in moderate-income geographies. The branch closures in low-income geographies had a negative effect on the accessibility of services to the population residing in those geographies and the closures in moderate-income geographies did not negatively affect the accessibility relative to the population residing in those geographies. Branch closures were due to reduced customer usage and proximity to other Chase branches. Despite the branch closures, branch locations in general remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA, particularly moderate-income geographies and/or individuals. Generally, branches are open Monday

through Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 947 CD Services to 55 organizations, logging 4,358 qualified hours. All of the bank's assistance were to organizations that provide community services to low- and moderate-income individuals and families. The bank's CD services were responsive to the community needs in the AA, particularly financial literacy, and affordable housing. The following are examples of CD services provided:

- The bank was responsive to a significant need in Indianapolis by educating 1600 low- and moderate-income seniors about how to prevent and report financial abuse.
- The bank partnered with a non-profit organization to host a financial inclusion seminar for low- and moderate-income physically challenged individuals.
- The bank provided homebuyer workshops and pre-purchase homebuyer education seminars, impacting over 350 low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Wayne-Huntington-Auburn, IN CSA is stronger than the bank's overall performance under the Service Test in the full-scope area due to stronger branch distribution. The bank's performance in the Bloomington-Bedford, IN; Lafayette-West Lafayette, IN; Indiana non-metropolitan; and South Bend-Elkhart-Mishawaka AAs is weaker than the bank's overall performance under the Service Test in the full-scope area due to a weaker percentage of branch distribution in low- and moderate-income geographies.

State Rating

State of Kentucky

CRA rating for the State of Kentucky¹⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- Overall good geographic distribution of home mortgage loans and small loans to businesses.
- Overall excellent borrower distribution of home mortgage loans and small loans to businesses.
- No CD loans were made, which has a negative effect on the Lending Test rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified investments, excellent responsiveness to credit and community economic development needs, significant use of innovative and/or complex investments, supported by the level of investments in the broader statewide area.
- Retail service delivery are readily accessible to geographies and individuals of different income levels.
- An adequate level of CD services in the full-scope AA.

Description of Institution's Operations in Kentucky

The state of Kentucky is Chase's 23rd largest rating area based on aggregate deposits of \$2.0 billion, representing 1.5 percent of the bank's total deposits. As of December 31, 2019, the bank operated 23 branches and 39 deposit-taking ATMs within the rating area, representing 0.4 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$1.3 billion in loans or 0.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 148 banks operating 1,144 branches in the state Kentucky. Chase ranked fourth in deposit market share with 4.1 percent. The top three banks and their deposit market share are Community Trust Bank (5.7 percent), U.S. Bank, N.A. (5.0 percent), and Truist Bank (4.6 percent).

Chase has delineated four AAs in the state of Kentucky. The Lexington-Fayette-Richmond-Frankfort, KY CSA (Lexington CSA) was selected for a full-scope review. The CSA consists of the Lexington-Fayette, KY MSA and Richmond-Berea, KY MiSA. The Bowling Green KY MSA, Owensboro KY MSA, and Kentucky Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

¹⁷ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Lexington CSA. Table A indicates that the volume of OOUs is very small in low-income CTs and over 23.1 percent of families in the AA are low-income with 13.0 percent below the poverty level. The median housing value in the Lexington CSA is three times the median income, three times the moderate-income and four times the low-income, indicating a limited proportion of OOUs are affordable to low-income borrowers. 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.

In the Lexington CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$22,993 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$58,369 mortgage loan with a payment of \$690 per month; a moderate-income borrower earning \$36,789 per year (or less than 80 percent of the FFIEC adjusted median family income in the CSA) could afford a \$124,149 mortgage loan with a payment of \$1,104 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 336 Lexington-Fayette-Richmond-Frankfort KY CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	110	9.1	23.6	34.5	32.7	0.0
Population by Geography	444,472	8.1	23.4	35.7	32.9	0.0
Housing Units by Geography	193,314	8.3	24.0	36.4	31.2	0.0
Owner-Occupied Units by Geography	98,861	4.3	17.4	36.6	41.6	0.0
Occupied Rental Units by Geography	77,267	12.7	32.0	35.9	19.5	0.0
Vacant Units by Geography	17,186	11.8	26.1	38.0	24.0	0.0
Businesses by Geography	35,865	5.8	17.8	40.4	36.0	0.0
Farms by Geography	1,340	4.6	13.6	39.6	42.2	0.0
Family Distribution by Income Level	106,669	23.1	15.2	18.3	43.4	0.0
Household Distribution by Income Level	176,128	25.8	15.1	15.6	43.5	0.0
Median Family Income MSA - 30460 Lexington-Fayette, KY MSA		\$66,800	Median Housing Value			\$174,308
Median Family Income Non-MSAs - KY		\$45,986	Median Gross Rent			\$758
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics December 2019 Report, the Lexington-Fayette CSA economy is expanding at a modest tempo. Job additions in the private sector have slowed since mid-2019, and the complete count of payrolls from the Quarterly Census of Employment and Wages suggests that initial estimates of job growth from mid-2018 to mid-2019 overstate gains and will be adjusted down. The area's strengths include low business costs; an educated workforce; favorable location and infrastructure for shipping; and abundant developable land compared to other metro areas. However, the area has a high reliance on state government and slowing population growth. Public sector employment accounts for a significant portion of jobs in the area, led by the presence of the University of Kentucky. The state of Kentucky is facing budgetary issues which will curb government spending and will impact government payrolls. In addition, manufacturing will also prove to be one of the area's weaker-performing industries over the near term, with risks skewed to the downside. Transportation equipment manufacturing accounts for a well above-average two-fifths of factory jobs. Statewide exports of transportation equipment to China fell 7.0 percent in the first 11 months of 2019, compared with a similarly sized increase in exports of such goods to other countries.

Major employment industries in the area include government; professional and business services; and education and health services. Major employers in the area include University of Kentucky; Toyota Motor Manufacturing; Xerox; St. Joseph Hospital. The area is well-suited for growth in white-collar industries because of the presence of University of Kentucky. In addition to its below-average office rents, the area has a wealth of talent with the share of adults with a bachelor's degree or higher near 40 percent. Lexington ranks highest in housing affordability among South metro areas with above-average shares of college-educated residents.

Community Contacts

Examiners considered six community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on affordable housing, economic/small business development and community services. Contacts noted that affordable, quality, housing is a need in the area as during the housing crisis many homes in the area that were in relatively good shape, were bought by investors and have since been flipped and price higher. This reduced the availability of affordable homes in low-income areas. Other needs identified included affordable housing, particularly for the elderly, workforce development, financial education for youth, micro-loans for small businesses and housing rehabilitation loans.

Contacts also noted that financial institutions could support the needs in the community by providing construction financing; supporting the development of affordable housing; and providing technical assistance to area small businesses.

Scope of Evaluation in Kentucky

The Lexington CSA received a full-scope review. The CSA accounts for 84.5 percent of the bank's deposits and 77.7 percent of lending in the state. The remaining three AAs received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

The bank's performance under the Lending Test in the state of Kentucky is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lexington CSA is good based on overall good lending levels and good geographic distribution of loans and excellent borrower distribution of loans.

Lending Activity

Lending levels reflect good responsiveness to the credit needs in the bank's AA.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 37.5 percent and 60.5 percent of the loan volume in the state by number and 80.4 percent and 17.7 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 2.0 percent of the loan volume in the state by number 1.9 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Lexington-Fayette-Richmond-Frankfort CSA	4,847	6,991	247	0	12,085	77.7	84.5
Bowling Green-Glasgow CSA	360	1,279	23	0	1,662	10.7	2.8
Owensboro MSA	389	853	43	0	1,285	5.2	10.1
Kentucky Non-MSA	230	286	5	0	521	6.4	2.6
Total	5,827	9,409	318	0	15,553	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Lexington-Fayette-Richmond-Frankfort CSA	888,249	179,223	19,886	0	1,087,358	85.4	84.5
Bowling Green-Glasgow CSA	60,409	24,427	182	0	85,018	6.7	2.8
Owensboro MSA	47,514	17,828	3,811	0	69,153	4.2	10.1
Kentucky Non-MSA	27,204	3,833	52	0	31,089	3.7	2.6
Total	1023376	225311	23931	0	1272618	100	100

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

Chase ranked first in deposits of 36 institutions with market share of 17.7 percent.

In overall HMDA lending, Chase ranked third with 5.0 percent market share placing. This is a highly competitive market with 368 mortgage lenders. No lender dominated the mortgage market. The top two lenders and their market share are University of Kentucky Federal Credit Union (6.4 percent) and Central Bank and Trust (5.7 percent).

In small loans to businesses, Chase ranked second with 16.8 percent market share out of 98 institutions. American Express National Bank led the market with 20.1 percent market share and PNC Bank, N.A. followed Chase with 7.4 percent of the market.

Chase ranked first in small loans to farms 29.23 percent market share. There are 18 lenders in the CSA. The other major lenders and their market are John Deere, Financial, F.S.B. (16.92 percent) and Central Bank and Trust (13.3 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 Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.3 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.

- The high level of competition in the AA (368 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was near to the proportion of OOU's in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income areas exceeded the proportion of OOU's in those geographies and near to the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. The proportion of loans in low-income geographies is well below the proportion of OOU's in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of OOU's and near to the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income was near to the proportion of small businesses and well-below the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 periods was consistent with 2017 to 2019. The proportion of loans to small businesses in low- and moderate-income was near to the proportion of small businesses and well-below the aggregate distribution of loans.

Small Loans to Farms

Refer to Table S in the state of Kentucky 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (4.6 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies exceeds both the proportion of farms in those geographies and the aggregate distribution of loans. The proportion of loans to small farms in moderate-income geographies was significantly below both the proportion of farms in those geographies and the aggregate distribution of loans.

- Performance in low- and moderate-income geographies during the 2014 to 2016 period was inconsistent with the performance during 2017 to 2019 period. Between 2014 and 2016, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and exceeded aggregate distribution of loans. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and exceeded the aggregate distribution of loans.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the bank.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Profile data indicates that there are high levels of poverty in the AA, resulting in difficulty in lending to low-income families.
- Greater significance was placed on the performance against the aggregate distribution as well as the moderate-income borrower distribution.
- During 2017 to 2019, the proportion of loans to low- and moderate-income borrowers was near to the proportion of low- and moderate-income families in the AA and exceeded the aggregate distribution of loans.
- Performance in low- and moderate-income geographies between 2014 and 2016 was consistent with performance in 2017 to 2019. The proportion of loans to low- and moderate-income borrowers was near to the proportion of low- and moderate-income families in the AA and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on the aggregate performance.
- In all time periods, the bank's distribution of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses located in the AA and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Kentucky 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Community Development Lending

The bank did not originate any CD loans during the evaluation period.

While the bank was unable to make any CD loans during the period, the bank continued to meet the needs of the low- and moderate-income individuals and geographies in Lexington CSA through qualified CD investments and service activities.

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

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. As outlined below, a total of 1,724 loans were funded totaling \$232.4 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	341	50,540
FHA	269	31,734
HARP	152	16,752
VA	171	32,507
SBA	30	4,944
USDA	761	95,919

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not change the initial overall conclusions based on the AA receiving the full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Bowling Green KY MSA, Owensboro KY MSA, and Kentucky Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. This is primarily due to the weaker geographic distribution performance. Performance in the limited-scope areas did not affect the overall Lending Test rating for the state of Kentucky.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Kentucky is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 14.2 percent of tier 1 capital allocated to the AA. A large majority (76.3 percent) of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. All current and prior period investments are considered responsive to credit and community economic development needs such as affordable housing and community service. Nearly all the current period investments support affordable housing, which is an identified need in the community. Additionally, the bank made two grants totaling \$119 thousand to support community services. All prior period investments are LIHTC investments that support affordable housing.

The bank makes significant use of innovative and/or complex investments to support CD initiatives. One current period investment, which accounted for 57.5 percent of the total dollar amount of current investments is considered complex as it is a Direct Investment LIHTC transaction. Additionally, one prior period investment, which accounted for 40.1 percent of the total dollar amount of prior investments still outstanding, is considered complex as a Direct Investment LIHTC transaction.

Qualified Investments – State of Kentucky										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Lexington-Fayette-Richmond-Frankfort CSA	8	7,456	11	24,023	19	15.57	31,478	24.45	0	0
Limited Review										
Bowling Green-Glasgow CSA	6	7,926	7	3,768	13	10.66	11,694	9.08	0	0
Owensboro MSA	4	3,069	3	2,034	7	5.74	5,103	3.96	0	0
KY Non-Metro AA	0	0	1	1,608	1	0.82	1,608	1.25	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	54	55,717	54	44.26	55,717	43.27	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	27	23,123	1	45	28	22.95	23,168	17.99	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.

Examples of CD Investments in the AA include:

- The bank made two investments totaling \$1 million in a LIHTC fund. This affordable housing property created 206 affordable units and was included in this fund's portfolio at the time of the bank's investment.
- The bank provided a \$74,500 grant to a community and technical college to support their relationship with a local high school. A college program was developed and enrolled approximately 125 students allowing them to spend time on the college campus interacting with students and faculty, participating in educational opportunities, and hearing presentations from academic and business leaders. Sixty-two percent of the student population is eligible for the Federal Free or Reduced Lunch Program in Jefferson County.
- The bank provided a \$45,000 grant to an organization for their economic empowerment project targeting low-income individuals in Fayette County. The organization collaborated with the community and technical college system to provide financial economic empowerment services such as financial education classes, credit building, Individual Development Accounts, micro-loans, and free tax preparation. The partnership enabled the expansion of its recognized economic empowerment project to serve students in a ready-to-work program that is designed to assist and support low-income parents.

Statewide Investment in the State of Kentucky

The bank has 82 current and prior period investments with and without a P/M/F to serve AAs in the state of Kentucky. These CD investments and grants primarily support affordable housing, with a few supporting community service, and one supporting revitalization/stabilization efforts. These investments enhanced the bank's performance in the state of Kentucky.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bowling Green MSA, Owensboro MSA and the combined Kentucky Non-Metro AA is consistent with the bank's overall excellent performance under the Investment Test in the full-scope area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Lexington CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is respectively near to and exceeds the percentage of the population. The bank had one branch in a low-income geography and four branches in moderate-income geographies. The distribution was augmented by two MUI tract branches that serve low-income tracts and four MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Lexington CSA	84.5	15	71.4	6.7	26.7	46.7	20.0	8.1	23.4	35.7	32.9

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

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 31 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of

these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank decreased the deposit-taking ATMs in low- and moderate-income geographies from the prior rating period to two (6.5 percent) deposit-taking ATMs in low-income geographies and eleven (35.5 percent) ATMs in moderate-income geographies. However, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

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

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and did not open or close any branches in moderate-income geographies. The branch closure was due to reduced customer usage and unprofitability. Despite the branch closure, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the AA, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank provides an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 238 CD service activities to 10 organizations for a total of 819 qualified hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services were responsive to the needs of the AA, particularly financial education. The following are examples of CD services provided in this AA:

- Three bank employees provided 27 hours of home ownership education benefitting 195 low- and moderate-income individuals. The employees provided information on mortgage products, services, and programs targeting low- and moderate-income homebuyers.
- Two bank employees provided 39 hours of financial literacy education benefitting 1,499 low- and moderate-income individuals. The employees provided personal finance education in savings methods, budgeting, consumer rights, and the value of money via an educational workshop.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Bowling Green-Glasgow, KY, Owensboro, KY, and KY non-MSA AAs is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance in the Bowling Green-Glasgow, KY and Owensboro, KY AAs is due to weaker branch distribution in low- and moderate-income geographies. For the KY non-MSA AA, the OCC based these conclusions on the provision of services to the AA in general, as there are no low- and moderate-income census tracts in the MSA.

State Rating

State of Louisiana

CRA rating for the State of Louisiana¹⁸: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- Adequate geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- A low level of CD loans, which negatively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- A good level of qualified investments that displayed excellent responsiveness to credit and community economic development needs.
- The occasional use of innovative and/or complex investments to support CD initiatives.
- A good level of statewide investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels.
- An adequate level of CD services that were responsive to AA needs.

Description of Institution's Operations in Louisiana

The state of Louisiana is Chase's 10th largest rating area based on deposits of \$17.5 billion, representing 1.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 119 branches and 346 deposit-taking ATMs within the rating area, representing 2.4 percent of total branches and 2.1 percent of total ATMs. The bank originated and purchased approximately \$7.0 billion in loans or 1.0 percent of total bank loan originations and purchases during the evaluation period in the state.

There were 128 institutions operating 1,435 offices in the state of Louisiana. Chase ranked second in deposit market share with 16.5 percent. The other major banks and their deposit market share are Capital One, N.A. (16.9 percent), Hancock Whitney Bank (12.7 percent), and Iberia Bank (8.4 percent).

The bank delineated nine AAs in Louisiana. The Baton Rouge MSA and Monroe-Ruston CSA, which combined account for 41 percent of the deposits and 23 percent of lending in the state, received full-scope reviews. The Alexandria MSA, Houma-Thibodaux MSA, Lafayette-Opelousas-Morgan City CSA, Lake Charles MSA, Louisiana Non-MSA (DeRidder), New Orleans-Metairie-Hammond CSA, and Shreveport-Bossier City MSA received limited-scope reviews. Refer to appendix A for a complete description of each AA.

Description of Full-Scope AAs

Baton Rouge MSA

The following table provides a summary of the demographics that includes housing and business information for the Baton Rouge MSA. Table A indicates that the volume of OOU's is small in low-income census tracts (4.0 percent) and over 25.9 percent of families in the AA are low-income. The Baton Rouge MSA's cost of housing is generally affordable. The median housing value in the Baton Rouge MSA is 2.5 times the median income, three times the moderate-income, and five times the low-income, indicating the proportion of OOU's that are affordable to low-income borrowers is more limited. 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.

In the Baton Rouge MSA, assuming a 30-year mortgage with a five percent interest rate, three percent down payment, and accounting for homeowners insurance, real estate taxes, but no other monthly expenses, a low-income borrower making \$32,797 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$105,102 mortgage with a payment of \$984 per month; a moderate-income borrower earning \$52,450 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$198,796 mortgage with a payment of \$1,574 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Baton Rouge LA MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	12.6	25.9	31.9	28.9	0.7
Population by Geography	751,275	7.5	22.5	33.6	36.3	0.0
Housing Units by Geography	309,273	8.2	23.1	33.0	35.7	0.0
Owner-Occupied Units by Geography	186,171	4.0	18.6	37.7	39.7	0.0
Occupied Rental Units by Geography	91,037	14.6	30.2	24.7	30.5	0.0
Vacant Units by Geography	32,065	14.1	28.7	29.9	27.2	0.0
Businesses by Geography	79,578	6.5	21.3	30.8	41.4	0.1
Farms by Geography	1,427	3.6	14.2	36.7	45.6	0.0
Family Distribution by Income Level	182,669	23.7	16.1	18.0	42.3	0.0
Household Distribution by Income Level	277,208	25.9	14.5	16.0	43.7	0.0
Median Family Income MSA - 12940 Baton Rouge, LA MSA		\$65,593	Median Housing Value			\$167,741
			Median Gross Rent			\$852
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics January 2020 Report, payrolls in the Baton Rouge area are rising rapidly after a year of almost zero growth. The construction industry is a major driver of this growth, with new industrial projects lifting demand for contractors. The uptick in net hiring has spurred workers to re-enter the labor force, which is now expanding for the first time since early 2018. The unemployment rate has risen since the summer, but labor force expansion is to blame rather than layoffs. Unfortunately, most new jobs pay low wages, slowing income growth. Moody's identifies several strengths in the area including low business costs; high housing affordability; and the presence of a large research university that is a source of stable employment. An expanding chemical manufacturing industry will be the predominant positive force in the area's economy over the next few years. Many new chemical plants are opening across the state to take advantage of cheap natural gas feedstock, pipeline access, and proximity to shipping routes for export. Baton Rouge will reap rewards from new investment given that several companies including Methanex, ExxonMobil, and Shell have announced significant investments for the construction of new facilities, creating a boost for the construction industry. Major employment sectors in the area include construction, education and health services, and government. The area's major employers include Turner Industries Group LLC (a construction engineering company); Louisiana State University; Performance Contractors; and Our Lady of the Lake Regional Medical Center. Net hiring in the area has been fast enough to spur increased demand in the housing market. House price gains accelerated in 2019.

Community Contacts

Three community contacts completed during the examination period with organizations and entities serving the community were reviewed to ascertain community credit needs. The organizations contacted focus on activities such small business as well as community and economic development. Contacts noted that the area is currently experiencing a boom in housing construction and several contractors are in the area. This increase in construction and renovation is partly due to the flooding that occurred in 2017 due to the hurricanes. The area is also seeing an increase in the manufacturing and retail sectors. Contacts indicated that there are opportunities available for bank involvement. While banks are providing donations to local organizations, financial education is a greater need. Banks could become more involved by providing face-to-face training on credit awareness, small business consulting, and entrepreneurial education. Other banking and credit needs include:

- Financial education
- Low-income housing
- Business lines of credit
- Startup/expansion business loans
- Refinance business loans

Monroe-Ruston CSA

The following table provides a summary of the demographics that includes housing and business information for the Monroe-Ruston CSA. Table A indicates that the volume of OOU's is smaller in low- and moderate-income census tracts (8.5 and 11.5 percent) than in MUI geographies. and over 26.9 percent of families in the AA are low-income. The Monroe-Ruston CSA's cost of housing is generally affordable. The median housing value in the Monroe-Ruston CSA is two times the median income, three times the moderate-income, and five times the low-income, indicating the proportion of OOU's that are affordable to low-income borrowers is more limited. 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.

In the Monroe-Ruston CSA, assuming a 30-year mortgage with a five percent interest rate, three percent down payment, and accounting for homeowners insurance, real estate taxes, but no other monthly expenses, a low-income borrower making \$24,087 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$63,574 mortgage with a payment of \$723 per month; a moderate-income borrower earning \$38,538 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$164,174 mortgage with a payment of \$1,156 per month.

Median rents and the percentage of families below poverty level (19.5 percent) suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 384 Monroe-Ruston LA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	22.0	14.0	24.0	38.0	2.0
Population by Geography	203,118	15.5	16.1	22.8	45.7	0.0
Housing Units by Geography	85,448	15.3	13.9	22.8	48.0	0.0
Owner-Occupied Units by Geography	43,661	8.5	11.5	21.9	58.1	0.0
Occupied Rental Units by Geography	31,198	22.6	16.1	23.4	37.9	0.0
Vacant Units by Geography	10,589	22.0	17.1	24.8	36.1	0.0
Businesses by Geography	19,755	15.8	12.6	21.1	50.3	0.2
Farms by Geography	476	5.5	7.1	24.6	62.6	0.2
Family Distribution by Income Level	47,725	25.0	15.7	15.2	44.1	0.0
Household Distribution by Income Level	74,859	26.9	14.5	14.8	43.9	0.0
Median Family Income MSA - 33740 Monroe, LA MSA		\$48,173	Median Housing Value			\$117,358
Median Family Income Non-MSAs - LA		\$46,614	Median Gross Rent			\$674
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics January 2020 Report, the area economy is in trouble. Nonfarm employment fell throughout 2019. Between mid-2018 and 2019, employment fell by about 1.5 percent. Employment declines are widespread, with about 70 percent of industries currently trimming payrolls. Most of the recent job losses have been high-paying positions. The population is declining in the area. The area has a low-per capita income and below average educational attainment. Despite recent investment in manufacturing, the industry will not be a source of new jobs. Manufacturing in Monroe is concentrated in paper production and poultry processing and neither segment is poised for an immediate turnaround. Weak demographics along with poor income growth has led to a decline in demand for consumer services. Retail is already shedding staff, and employment in leisure/hospitality is flat. Total income is rising more slowly than inflation, limiting household spending. Major employment industries include education and health services; retail trade; and government. Major employers in the area include Centurylink; Foster Farms; St. Francis Specialty Hospital, Inc., and JP Morgan Chase. Poor labor market outcomes have reduced housing demand. House prices have fallen since midyear, more than erasing gains made in early 2019.

Community Contacts

Two community contacts completed during the examination period with organizations and entities serving the community were reviewed to ascertain community credit needs. The organizations contacted focus on activities such as small business as well as community and economic development. Contacts indicated that there was a need to develop more affordable multi-family housing for low-income residents in the area. The area is also in need of small business incubators to provide workshops, seminars, classes, advice, and financial options to new and existing small businesses. There are opportunities for participation by local financial institutions to support area needs, including developing partnerships with area non-profits. Contacts also indicated that there was a need to repurpose vacant and abandoned commercial properties. Other identified needs in the area include:

- Workforce development training to align skills with employer needs
- Small dollar loans/micro-lending to small business owners
- Support for programs to promote entrepreneurship for low-income individuals

Scope of Evaluation in Louisiana

The Baton Rouge MSA and Monroe-Ruston CSA received full-scope reviews. The two areas account for 41 percent of the deposits and 23 percent of the lending in the state. More weight was placed on performance in the Baton Rouge MSA based on the bank's higher level of deposits and lending. These AAs were selected as they had not received a full-scope review in recent performance evaluations. The remaining seven AAs in the state of Louisiana received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Low Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Baton Rouge MSA and Monroe-Ruston CSA is adequate. Overall good lending levels and good borrower distribution of loans offset adequate geographic distribution of loans, and a low level of CD lending. In addition, product innovation and flexibility were considered favorably.

Lending Activity

Lending levels reflect good responsiveness to the credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 27.9 percent and 71.1 percent of the loan volume in the state by number and 68.2 and 28.0 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.83 percent of the loan volume in the state by number and 0.32 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Baton Rouge	6,031	11,603	86	4	17,724	19.8	37.2
Monroe-Ruston	1,089	2,052	67	2	3,210	3.6	3.8
Alexandria MSA	517	1,128	35	2	1,682	1.9	1.7
Houma-Thibodaux	1,948	2,555	54	0	4,557	5.1	3.2
Lafayette-Opelousas-Morgan City	2,961	8,893	199	3	12,056	13.5	9.5
Lake Charles-Jennings	1,217	3,035	43	1	4,296	4.8	4.0
Louisiana Non-MSA (DeRidder)	149	314	15	2	480	0.5	0.3
New Orleans-Metairie-Hammond	9,684	30,274	179	12	40,149	44.9	34.0

Shreveport-Bossier City	1,460	3,804	64	2	5,330	6.0	6.2
Total	25,036	63,658	742	28	89,484	100.0	100.0

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

Dollar Volume of Loans*(‘000’s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Baton Rouge	1,345,014	406,696	1,372	21,902	1,774,984	24.8	37.2
Monroe-Ruston	156,966	63,932	5,374	795	227,067	3.3	3.8
Alexandria MSA	67,679	18,517	1,714	7,935	95,845	1.4	1.7
Houma-Thibodaux	293,102	76,843	409	0	370,354	5.4	3.2
Lafayette-Opelousas-Morgan City	499,597	282,638	5,815	23,200	811,250	11.6	9.5
Lake Charles-Jennings	189,303	99,860	2,706	2,647	294,516	4.3	4.0
Louisiana Non-MSA (DeRidder)	19,797	4,034	805	13,925	38,561	0.6	0.3
New Orleans-Metairie-Hammond	1,950,632	890,486	1,841	155,130	3,038,089	43.7	34.0
Shreveport-Bossier City	223,177	120,914	2,456	835	347,382	5.1	6.2
Total	4,785,267	1,963,920	22,492	239,162	7,010,841	100.0	100.0

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

Baton Rouge MSA

Chase ranked first in deposits out of 34 institutions with 35.5 percent market share.

In overall home mortgage lending, Chase ranked second out of 415 lenders with 4.9 percent market share, placing it in the top one percent of lenders. This is a highly competitive market with no significantly dominant lender. The top lender was GMFS LLC with 9.5 percent market share.

In small loans to businesses, Chase ranked third out of 97 institutions with 10.0 percent market share, placing it in the top three percent of lenders. The other major lenders and respective market shares are American Express National Bank (17.9 percent) and Lake Forest Bank and Trust (11.5 percent).

In small loans to farms, Chase ranked second out of 11 lenders with a 20.9 percent market share. The other major lenders and respective market shares are John Deere Financial, F.S.B. (29.9 percent), Wells Fargo Bank, N.A. (16.4 percent), Capital One, N.A. (7.5 percent), and Bank of America, N.A. (7.5 percent).

Monroe-Ruston CSA

Chase ranked first in deposits of 17 institutions with market share of 35.5 percent.

In overall home mortgage lending, Chase ranked sixth out of 221 lenders with 4.2 percent market share, placing it in the top three percent of lenders. This is a highly competitive market. The top three lenders and their market share are Origin Bank (8.0 percent), BancorpSouth Bank (6.3 percent), and Wells Fargo Bank, N.A. (5.4 percent).

In small loans to businesses, Chase ranked fourth out of 63 institutions with 7.6 percent market share. The top three lenders and their market share are Origin Bank (15.5 percent), American Express National Bank (14.9 percent), and Lake Forest Bank and Trust (8.3 percent).

In small loans to farms, Chase ranked second out of the 10 lenders with a 20.5 percent market share. The other major lenders and respective market shares are John Deere Financial, F.S.B (21.8 percent), Wells Bank, N.A. (20.5 percent), and BancorpSouth (15.4 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is adequate. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (4.0 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The level of competition in the AA (415 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was well below both the percentage of owner-occupied units and the aggregate distribution of loans. In moderate-income areas, the proportion of loans was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans. The performance in moderate-income geographies was well below the percentage of owner-occupied units and near to the aggregate distribution of loans.

Monroe-Ruston CSA

- The smaller proportion of housing units in low- and moderate-income geographies was considered, particularly OOUs (20.0 percent), which provided less lending opportunity compared to opportunities in MUI geographies (80.0 percent OOUs).
- The level of competition in the AA (221 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas was near to both the percentage of owner-occupied units and the aggregate distribution of loans.
- Between 2014 and 2016, performance was weaker than in 2017 to 2019. The proportion of loans in low-income areas was well below the percentage of owner-occupied units and near to the aggregate distribution of loans. The proportion of loans in moderate- income areas was below the percentage of owner-occupied units and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- The small proportion of businesses in low-income geographies (6.5 percent) and competition between 97 lenders constrains lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was respectively well below and below the proportion of businesses and the aggregate distribution.

Monroe-Ruston CSA

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was respectively well below and below the proportion of businesses. The proportion of loans in low- and moderate-income geographies was respectively below and near to the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Louisiana 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- The limited number of farms in low-income geographies (3.6 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies met the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and near to the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was below the proportion of farms in those geographies and well below the aggregate distribution for the geographies. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution.

Monroe-Ruston CSA

- The limited percentage of farms in low-income geographies (5.5 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below both the proportion of farms and the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms and the aggregate distribution.
- The proportion of loans to small farms in low-income geographies was well below both the proportion of farms and aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms and exceeded the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the institution.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered the high level of poverty and housing affordability challenges, especially for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans met the proportion of moderate-income families and was near to the aggregate distribution of all lenders.

- During 2014 to 2016 the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was near to the aggregate distribution.

Monroe-Ruston CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered the high level of poverty, unemployment rate, and housing affordability challenges, especially for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was well below the proportion of moderate-income families and below the aggregate distribution of all lenders.
- During 2014 to 2016, the bank's lending to moderate-income borrowers was stronger than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Monroe-Ruston CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Louisiana 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

Baton Rouge MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.

Monroe-Ruston CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

Community Development Lending

The institution has made a low 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.

Baton Rouge MSA

The bank made four CD loans in its AA for a total of \$21.9 million, which represents 2.6 percent of the tier 1 capital allocated to the AA.

Examples of CD loans include:

- In February 2015, the bank made a \$9.3 million construction loan to build a new apartment complex in a moderate-income tract in Baton Rouge, LA. The project created 144 affordable housing units for low- and moderate-income senior residents age 55 and older.
- In May 2018, the bank made a \$5.5 million construction loan develop 48 new affordable housing units for low- and moderate-income seniors in Baton Rouge, LA.

Monroe-Ruston CSA

The bank made two CD loans in its AA for a total of \$795,000, which represents 0.9 percent of the tier 1 capital allocated to the AA.

An example of CD loans includes:

- In October 2014, the bank made a \$765,000 loan to provide affordable housing in an area that the National Low-Income Housing Coalition identified as being in need. Sixty one of the 67 units will be restricted to low- and moderate-income families and individuals.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs in each of the full-scope AAs reviewed. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Baton Rouge MSA

As outlined below, a total of 2,696 loans were funded totaling \$478.8 million.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	191	33,808
FHA	450	57,461
HARP	256	31,845
VA	118	21,411
SBA	57	10,703
USDA	1,624	323,555

Monroe-Ruston CSA

As outlined below, a total of 648 loans were funded totaling \$83.1 million.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	18	2,381
FHA	71	8,188
HARP	71	7,865
VA	46	7,412
SBA	10	934
USDA	432	56,289

Conclusions for Areas Receiving a Limited-Scope Review

Performance in the limited-scope AAs was factored into the state's overall Low Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the New Orleans-Metairie-Hammond CSA and in the Lafayette-Opelousas-Morgan City CSA is stronger than the bank's overall adequate performance in the full-scope areas. In the Alexandria MSA, Houma-Thibodaux MSA, Lake Charles MSA, Shreveport-Bossier City MSA, and Louisiana Non-MSA (DeRidder), performance is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Louisiana is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Baton Rouge MSA is adequate and in Monroe-Ruston CSA is excellent.

Number and Amount of Qualified Investments

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

Qualified Investments – State of Louisiana										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Baton Rouge MSA	18	8,409	29	11,044	47	17.47	19,453	13.50	0	0
Monroe-Ruston CSA	11	6,192	6	385	17	6.32	6,577	4.56	0	0
Limited Review:										
Alexandria MSA	4	1,156	0	0	4	1.49	1,156	0.80	0	0
Houma-Thibodaux MSA	2	980	1	7,727	3	1.12	8,706	6.04	0	0
Lafayette-Opelousas-Morgan City CSA	11	1,512	16	8,745	27	10.04	10,258	7.12	0	0
Lake Charles MSA	4	1,396	0	0	4	1.49	1,396	0.97	0	0
New Orleans-Metairie-Hammond CSA	35	18,026	63	53,859	98	36.43	71,885	49.88	0	0
Shreveport-Bossier City MSA	12	729	9	1,019	21	7.81	1,748	1.21	0	0
LA Non-Metro AA	0	0	0	0	0	0	0	0.00	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	11	21,599	11	4.09	21,599	14.99	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	36	1,304	1	27	37	13.75	1,331	0.92	0	0
Total	133	39,704	136	104,406	269	100.00	144,109	100.00	0	0

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

Baton Rouge MSA

The bank has an adequate level of qualified investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 2.3 percent of tier 1 capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs. All current period investments and 84.4 percent of the total dollar amount of prior period investments are considered responsive to credit and community economic development needs such as affordable housing, community service, and revitalization/stabilization efforts. The bank made three qualified investments totaling \$9.7 million supporting affordable housing in the current period. Twenty-six current period grants totaled \$1.3 million with 50.4 percent of the total dollar amount supporting revitalization/stabilization efforts, 41.0 percent supporting community service, and 8.6 percent supporting affordable housing. Additionally, all prior period investments still outstanding supported affordable housing.

The bank occasionally uses innovative and/or complex investments to support CD initiatives. None of the current period investments are considered innovative and/or complex. However, 6.1 percent of the total dollar amount of current period investments are considered catalyst investments as they are part of

a local government plan for revitalization/stabilization that will encourage future growth and improvement. Additionally, 63.5 percent of the total dollar amount of prior investments still outstanding are considered complex as they are Direct Investment LIHTC transactions.

Examples of CD Investments in the AA include:

- The bank provided \$7.4 million of equity in a project that was funded by a LIHTC fund investment, contributing to the creation of 100 affordable housing units.
- The bank provided a \$100,000 grant to a redevelopment authority to allow them to redevelop Baton Rouge's oldest commercial corridor into a transit-oriented neighborhood. The goal was to help stabilize and revitalize the Plank Road corridor communities with opportunities for existing and new businesses, including workforce development and reduction of crime and public health hazards. The bank's support helped with the efforts to build strong communities where blight mitigation and property stabilization is a priority and helped them grow and stabilize the area.
- The bank provided five grants totaling \$339,000 to a redevelopment organization whose mission is to develop and promote the growth and revitalization of mid-city Baton Rouge by attracting new and retaining current residents.
- Three grants helped revitalize and stabilize communities through redeveloping underutilized or vacant buildings, in this case, redevelopment of three historic fire stations that are no longer in service. Revitalization of these three underutilized buildings will drive economic growth, preserve historical sites, and inspire reinvestment in low- and moderate-income communities. These investments serve a catalyst for other community development activities for revitalization or stabilization that will encourage future growth and improvements in the area.
- One grant was for to provide continuous support for the organization's home ownership program, which serves as a HUD approved housing counseling agency that provides credit counseling, first-time home buyer education, financial literacy and foreclosure intervention and default counseling in East Baton Rouge and surrounding parishes. A significant majority or 90 percent of its program participants earn an annual income that is less than 80 percent the area's median family income.
- The remaining grant was for the organization's leadership program, geared to residents demonstrating an interest in leading neighborhood change. Residents will be recruited from several areas, Old South Baton Rouge, Convention Street, Glen Oaks, Scotlandville, and Plank Road, and will receive training on effective strategies for improved neighborhood development.

Monroe-Ruston CSA

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 7.6 percent of tier 1 capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs. All current and prior period investments are considered responsive to credit and community economic development needs such as affordable housing and community service. The bank made six current period grants totaling \$385 thousand with 84.4 percent of the total dollar amount supporting community

service and 15.6 percent supporting affordable housing. Additionally, all prior period investments still outstanding supported affordable housing.

The bank makes significant use of innovative and/or complex investments to support CD initiatives. None of the current period investments are considered innovative and/or complex. However, 85.7 percent of the total dollar amount of prior investments still outstanding are considered complex as they are Direct Investment LIHTC transactions.

Examples of CD Investments in the AA include:

- The bank provided four grants totaling \$314,980 to a local foundation to support their Workforce Solution's Program to benefit low-income students in Monroe.
- One grant supported the Foundation's workforce development plan, including specific needs of businesses. Focusing on those needs, area institutions of higher education developed programs to teach and train students. After graduation, students were linked back to employers for placement in good jobs with benefits.
- One grant supported the foundation's Accounting Tech Program for high school students in Quachita Parish, LA. The program prepares participants to work as bookkeepers, tax preparers and other careers in high demand in the region. It also prepares the students to enroll at in a local community college and university. The community college will work in partnership with Monroe City Schools to develop and supervise a remedial math program for students who want to enroll in the Accounting Tech program but need to improve their math score.
- Two grants were provided for the foundation's healthcare workforce strategy to benefit low-income residents in Monroe, LA. Funding will support the foundation's workforce development plan in partnership with another organization that find solutions for employers who could not find skilled and qualified employees.
- The bank provided a \$60,000 grant to community development corporation, located in Monroe, for its neighborhood revitalization pilot project. Funding was used to launch a 24-month pilot project focused on cultivating neighborhood developers with the capacity to build affordable housing and assist low- and moderate-income families in attaining homeownership. Eighty percent of those who benefitted are of low- and moderate-income. The project was a collaboration with the City of Monroe's Planning and Urban Development Department targeting South Monroe neighborhoods struggling with blight, aging housing stock and in need of new investment. The project provided certification training and support for small contractors/developers/individuals interested in being neighborhood developers that advanced a system to transfer adjudicated property to those who complete the program and to build affordable homes for first-time homebuyers.
- The bank provided a \$10,000 grant to an organization to cover its operating expenses. The organization provides individuals with developmental disabilities assistance with learning social and other skills and teaches those without disabilities how to relate without hesitations. The majority of those the organization serves are of low-income.

Statewide Investments in the State of Louisiana

The bank has 48 current and prior period CD investments and grants with and without a P/M/F to serve AAs in the broader statewide or regional area. Ninety-four percent support affordable housing and six percent support community services. These statewide investments further supported the bank's overall good performance under the Investment Test in the state of Louisiana.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lafayette-Opelousas-Morgan City CSA is consistent with the bank's overall good performance under the Investment Test in the full-scope areas. Performance under the Investment Test in the New Orleans-Metairie-Hammond CSA and Houma-Thibodaux MSA is stronger than the bank's overall good performance under the Investment Test in the full-scope areas. Stronger performance is due to a higher level of investments. Performance under the Investment Test in the Shreveport-Bossier City MSA, Alexandria MSA, Lake Charles-Jennings CSA, and LA Non-Metro AA is weaker than the bank's overall good performance under the Investment Test in the full-scope areas. Weaker performance is based on low levels of qualified investments. Performance differences in the limited-scope AAs did not impact the overall Investment Test rating for the state of Louisiana.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, including the data in the tables below, the bank's performance in the Baton Rouge MSA and the Monroe-Ruston CSA is good. More weight was given to the Baton Rouge, LA MSA due to the larger deposit base, lending, and branch presence.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Baton Rouge MSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution exceeds the percentage of the population. The bank had two branches in low-income geographies and eight branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves low-income tracts and one MUI tract branches that serves moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Monroe-Ruston CSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is near to the percentage of the population. The bank had one branch in a low-income geography and one branch in a moderate-income geography. The distribution was augmented by one MUI tract branch that serves low-income tracts and two MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Assessment Area	Distribution of Branch Delivery System							As of December 31, 2019			
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Baton Rouge MSA	37.2	25	21.0	8.0	32.0	32.0	28.0	7.5	22.5	33.6	36.3
Monroe-Ruston CSA	3.8	8	6.7	12.5	12.5	37.5	37.5	15.5	16.1	22.8	45.7

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

Baton Rouge MSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 72 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 50.0 percent over the prior rating period to eight (11.1 percent) deposit-taking ATMs in low-income geographies and 22 (30.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Monroe-Ruston CSA

Alternative delivery systems generally enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 20 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank decreased the deposit-taking ATMs in low- and moderate-income geographies to two (10.0 percent) deposit-taking ATMs in low-income geographies and four (20.0 percent) ATMs in moderate-income geographies. Bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Baton Rouge MSA	1	7	-1	-1	-1	-3
Monroe-Ruston CSA	0	3	-1	-1	0	-1

Baton Rouge MSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and closed one branch in a moderate-income geography. Branch closures were due to reduced customer usage and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 5:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Monroe-Ruston, CSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and closed one branch in a moderate-income geography. Branch closures were due to proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA as the three adjacent branches provided continued accessibility to customers in the low- and moderate-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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

Baton Rouge MSA

The bank provides an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 174 CD service activities to 16 organizations for a total of 372 qualified hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services were responsive to the needs of the AA, particularly financial education. The following is an example of CD services provided in this AA:

- Bank employees conducted 78 financial education and first-time homebuyer seminars conjunction with a non-profit organization that served 548 low- and moderate-income individuals.

Monroe-Ruston CSA

The bank provides an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 54 CD service activities to 6 organizations for a total of 150 qualified hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The services were responsive to the needs of the AA particularly financial education. The following is an example of CD services provided in this AA:

- Bank employees conducted 43 financial literacy seminars conjunction with a non-profit organization that served 215 low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Lafayette-Opelousas-Morgan City, LA and Lake Charles-Jennings, LA AAs is stronger than the bank's overall performance under the Service Test in the full-scope areas due to stronger branch distribution. Performance in the Houma-Thibodaux, LA and Shreveport-Bossier City, LA AAs is consistent with performance in full-scope AAs, while performance in the Alexandria, LA and New Orleans-Metairie-Hammond, LA-MS AAs is weaker than the bank's performance in the full-scope areas due to weaker branch distribution in low- and moderate-income geographies. The bank's performance under the Service Test in the DeRidder-Fort Polk South, LA CSA is also weaker than the bank's overall performance under the Service Test in the full-scope areas. The OCC based limited-scope conclusions on the provision of services to the AA in general as there are no low- and moderate-income census tracts in the CSA.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts¹⁹: 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:

- An excellent level of lending activity.
- A good geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which had significantly positive affect on the rating.
- The extensive use of flexible products, which had a positive effect on the rating.
- An excellent level of CD investments that demonstrated excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex qualified investments.
- A high level of investments in the broader statewide areas.
- Weak performance in limited-scope areas had a negative effect on readily accessible retail service delivery systems in the full-scope AA.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Massachusetts

The state of Massachusetts is Chase's 30th largest rating area based on its total deposits of \$178.7 million, representing less than one percent of the bank's total deposits. As of December 31, 2019, the bank operated 15 branches and 103 deposit-taking ATMs within the rating area, representing 0.3 percent of total branches and 0.6 percent of total ATMs. The bank originated and purchased approximately \$7.5 billion in loans or 1.1 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC deposit market share data, as of June 30, 2019, there were 143 banks operating 2,137 branches in the state of Massachusetts. The bank-maintained six branches with deposits of \$178.0 million in the state ranking it 111th in deposit market share with 0.1 percent. State Street Bank and Trust Company was first in deposit market share with 26.3 percent, followed by Bank of America, N.A. with 19.3 percent and Citizens Bank with 10.4 percent.

The bank delineated three AAs in the state of Massachusetts. The Boston-Worcester-Providence CSA (Boston CSA), which accounts for 100 percent of the bank's deposits in Massachusetts, received a full-scope review. The bank entered the Worcester MSA portion of the rating area on March 20, 2019, and the Cambridge-Newton-Framingham MD portion of the rating area on March 21, 2019. The Pittsfield MSA and Springfield MSA, which have only deposit-taking ATMs and no branches, received limited-scope reviews. The delineated AAs are described in appendix A.

¹⁹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

Boston CSA

The following table provides a summary of the demographics that includes housing and business information for the Boston CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (3.5 percent) and over 23.5 percent of families in the AA are low-income. The Boston CSA's high cost of housing also limits access to affordable homeownership among LMI borrowers. The median housing value in the Boston CSA is approximately 4.2 times the averaged median income across the CSA, 5.3 times the moderate-income, and 8.5 times the low-income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Boston CSA, assuming a 30-year mortgage with a 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 \$45,369 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$164,991 mortgage with a payment of \$1,361 per month; a moderate-income borrower earning \$72,590 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$294,779 mortgage with a payment of \$2,178 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,088	12.0	19.5	37.3	29.2	1.9
Population by Geography	5,081,221	10.0	19.4	38.9	31.3	0.3
Housing Units by Geography	2,049,323	9.7	20.0	39.9	30.2	0.3
Owner-Occupied Units by Geography	1,163,856	3.5	14.3	44.1	38.0	0.1
Occupied Rental Units by Geography	748,516	18.9	27.9	33.8	18.9	0.5
Vacant Units by Geography	136,951	11.8	24.6	38.3	24.9	0.5
Businesses by Geography	418,244	7.2	14.9	36.6	40.5	0.7
Farms by Geography	8,327	3.1	11.0	43.8	42.0	0.1
Family Distribution by Income Level	1,216,812	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	1,912,372	26.7	14.4	16.3	42.7	0.0
Median Family Income MSA - 14454 Boston, MA		\$90,699	Median Housing Value			\$385,202
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		\$100,380	Median Gross Rent			\$1,232
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137	Families Below Poverty Level			7.7%

Source: 2015 ACS and 2019 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.

Economic Data

According to the September 2019 Moody's Analytics report the area has a highly educated workforce with a large presence of biotech and IT firms that bolsters high wage employment. Major employment industries include healthcare, education, professional and business services. Major employers include Partners Healthcare, University of Massachusetts, Stop and Shop Supermarkets, Steward Healthcare System, and Harvard University. Unemployment is low; however, the area has a high cost of living and high housing costs which makes it difficult to attract workers to fill lower-wage and mid-wage jobs, particularly in industries not related to biotech or IT.

Community Contacts

A review was conducted of seven community contacts completed during the examination period. The contacts were conducted with organizations located throughout the rating area. The mission of the organizations contacted focused on several areas including affordable housing, community development, and community revitalization. The area is served by numerous nonprofits, community development financial institutions, and community development entities providing multiple opportunities for participation and support by area financial institutions. Most contacts noted the high cost of housing in the area as a significant concern as most low- and moderate-income residents are challenged in finding both affordable rental housing as well as homes to purchase. The contacts identified the following needs in the community:

- Affordable Housing, including affordable rental housing
- Housing Counseling Assistance
- Loan programs for small businesses that do not meet traditional lending requirements
- Loan programs to support the rehabilitation of older housing
- Support for financial education programs
- Low cost deposit and loan products to help low and moderate-income individuals establish and repair credit.

Scope of Evaluation in Massachusetts

The Boston CSA, which accounts for 100 percent of the bank's deposits in Massachusetts, received a full-scope review. The remaining AAs in the state of Massachusetts received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Boston CSA is excellent. Overall excellent lending levels and leadership in CD lending enhance good geographic and borrower distribution of loans. Product innovation and flexibility was also considered favorably.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 36.7 percent and 62.9 percent of the loan volume in the state by number and 92.9 and 4.3 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.2 percent of the loan volume in the state by number and 0.02 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Boston-Worcester-Providence CSA	15,032	24,664	101	33	39,830	95.8	100.0
Pittsfield MSA	90	616	10	0	716	1.7	0.0
Springfield MSA	159	851	9	0	1,019	2.5	0.0
Total	15,281	26,131	120	33	41,565	100.0	100.0

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

Dollar Volume of Loans* ('000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Boston-Worcester-Providence	6,902,557	303,783	1,046	205,955	7,413,341	98.9	100.0
Pittsfield MSA	27,582	9,988	86	0	37,656	0.5	0.0
Springfield MSA	31,338	10,210	89	0	41,637	0.6	0.0
Total	6,961,477	323,981	1,221	205,955	7,492,634	100.0	100.0

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

Chase ranked 111th in deposits with 0.1 percent market share.

In overall home mortgage lending, Chase ranked seventh out of 593 lenders with a 2.6 percent market share. Other lenders in the market include Citizens Bank, N.A. (5.5 percent), Wells Fargo Bank, N.A. (4.9 percent), and Bank of America, N.A. (3.7 percent).

In small loans to businesses, Chase ranked third out of 182 lenders with 9.9 percent market share. Other major lenders are American Express National Bank (26.2 percent), Bank of America, N.A. (12.9 percent), and Citibank, N.A. (7.4 percent).

In small loans to farms, Chase ranked first out of 18 lenders with a 29.9 percent market share. The other major lenders and respective market shares are U.S. Bank, N.A. (19.0 percent), Bank of America, N.A. (17.0 percent), and Capital One, N.A. (9.3 percent).

The comparison between deposit and lending market share rankings supports the bank's excellent responsiveness. Factors considered included:

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 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.5 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was near to the percentage of owner-occupied units and below the aggregate distribution of loans. In moderate-income areas the proportion of loans exceeded the percentage of owner-occupied units and was near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-and moderate-income geographies was below the percentage of owner-occupied units and the aggregate distribution of loans.

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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- The small proportion of businesses in low-income geographies (7.2 percent) and competition between 593 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was below both the proportion of businesses and near to the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies, (3.1 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was below the proportion of farms in those geographies and near to the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.
- During 2014 to 2016 period the bank made no loans to small farms in low- or moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the institution.

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 bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and the aggregate distribution of lenders. The proportion of moderate-income loans was near to the proportion of moderate-income families and below the aggregate distribution.
- During 2014 to 2016 the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and the aggregate distribution.

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 bank's origination and purchase of small loans to businesses.

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with its performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Massachusetts 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and exceeded the aggregate distribution.

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.

The bank made 33 CD loans in its AA for a total of \$206.0 million, which represents 894.7 percent of the tier 1 capital allocated to the AA.

Examples of CD loans in the AA include:

- In November 2014, the bank provided a \$7.7 million loan to preserve the availability of 60 units of affordable housing, which will be comprised of 39 one-bedroom units, 17 two-bedroom units, three three-bedroom units, and one studio unit. The project was located in Belmont, MA.
- In April 2017, the bank provided a total of \$1.7 million in community service loans. The proceeds were used by a community center in a low-income census tract in the Boston area. The center provides high impact programs that help youth in the Allston-Brighton community succeed academically, explore, and master the arts, develop career readiness skills, and adopt healthy lifestyles.
- In July 2019, the bank provided a loan for \$40.0 million to create 55 affordable housing units in public transportation-oriented areas. The project was aligned with the Concord-Alewife Plan, which included addressing the housing stock and affordability needs in Cambridge, MA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As outlined below, a total of 1,210 loans were funded totaling \$384.2 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	710	236,754
FHA	221	75,069
HARP	184	35,986
VA	83	33,886
SBA	0	0
USDA	12	2,512

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Examiners considered that there are no deposits attributed to these AAs and the bank's presence is limited to deposit-taking ATMs. Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA and Springfield MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance results from weaker geographic and borrower distributions.

Refer to Tables O through T 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 the state of Massachusetts is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified investment, often in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period qualified investments represent 746.0 percent of tier 1 capital allocated to the AA. A significant majority, or 91.4 percent of total investments, represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank made 36 CD investments totaling \$149.7 million, with 72.3 percent supporting affordable housing, 13.4 percent supporting community service, and 14.3 percent supporting revitalization/stabilization efforts. 44 grants totaled \$7.3 million with 98.6 percent supporting community service and 1.4 percent supporting revitalization/stabilization efforts. All prior period investments still outstanding are considered responsive to credit and community economic development needs such as affordable housing

and community service. In addition, 18 of the current period investments, or 26.5 percent, are catalysts for future development and investment and mainly relate to NMTC financings.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Exclusive of grants, 25 of the 80 current period investments are considered complex as they are mainly related to Direct Investment LIHTC and NMTC transactions. Additionally, 19.7 percent of the total dollar amount of prior investments still outstanding consist of complex Direct Investment LIHTC and NMTC transactions.

Examples of CD Investments in the AA include:

- The bank provided \$23.1 million in a LIHTC investment that contributed to the creation of 95 affordable housing units to be used by low- and moderate-income individuals and families.
- The bank provided \$2.2 million of equity in a LIHTC, which contributed to the creation of 83 affordable housing units in a low- and moderate-income facility for senior living. This facility provides senior care options that includes assisted living and independent living for elderly low-income adults in this AA.
- The bank provided a \$7.2 million NMTC equity investment that was used for a hotel project, located in a low-income tract in Boston's Dudley Square community. The project was part of a greater neighborhood urban renewal effort to redevelop the Dudley Square area as detailed in the Roxbury Strategic Master Plan. This project was the primary component of a multi-use development project consisting of a 135-room hotel and commercial/retail space that will help with the revitalization of the low-income area. The Hotel and adjacent retail component created 40 permanent jobs and the construction created over 250 jobs.

Qualified Investments – State of Massachusetts										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
	Full Review:									
Boston-Worcester-Providence CSA	43	14,733	80	156,987	123	73.6	171,720	68.1	0	0
Limited Review:										
Pittsfield MSA	3	626	0	0	3	1.8	626	0.2	0	0
Springfield MSA	4	612	2	7,117	6	3.6	7,729	3.1	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	25	45,869	25	15.0	45,869	18.2	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	10	26,116	0	0	10	6.0	26,116	10.4	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.

Statewide Investment in the State of Massachusetts

The bank has qualified investments throughout the state of Massachusetts whose P/M/F include serving the AAs. Forty-eight percent support affordable housing, 29 percent support community services, and 22 percent support revitalization/stabilization. Affordable housing and support for community service organizations are particular needs within the state. Investments with no P/M/F to serve AAs support affordable housing and community services. Investments with and without a P/M/F to serve AAs represent 29 percent of total state qualified investments. These investment in the broader statewide area further support the bank's overall performance under the Investment Test in state of Massachusetts.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Pittsfield MSA and Springfield MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Massachusetts is rated High Satisfactory. Weak performance in limited-scope areas had a negative effect on strong performance in the full-scope AA.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution respectively exceeds and is well below the percentage of the population. The bank had three branches in low-income geographies and one branch in a moderate-income geography. The distribution was augmented by three MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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 (percent)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boston-Worcester-Providence, CSA	100	15	100	20.0	6.7	6.7	66.7	10.0	19.4	38.9	31.3

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 96 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by almost 100.0 percent as there was only one ATM in this AA during the prior evaluation period. The bank installed or acquired 17 (17.7 percent) deposit-taking ATMs in low-income geographies and eight (8.3 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boston CSA	15	0	+3	+1	+1	+10

The bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened three branches in low-income geographies and one branch in a moderate-income geography. The increase in branches in this AA was part of the bank's branch expansion strategy. The bank did not 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. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 394 CD service activities to 38 organizations, logging 1,699 qualified hours. All of the bank's assistance were to organizations that provide community services to low- and moderate-income individuals and families. The bank's CD services were responsive to the community needs in the AA, particularly financial literacy. The following are examples of CD services provided:

- The bank provided financial literacy training to more than 950 low- and moderate-income individuals.
- The bank provided six homebuyer seminars to more than 250 low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and had a negative effect on the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Pittsfield, MA and Springfield, MA AAs is very poor and weaker than the bank's excellent performance under the Service Test in the full-scope area due to very weak branch distribution in low- and moderate-income geographies.

State Rating

State of Michigan

CRA rating for the State of Michigan²⁰: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- A good level of lending activity.
- Overall adequate geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- A leader in making CD loans, which positively affected the rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified investments, excellent responsiveness to credit and community economic development needs, and a high level of investments in the broader statewide or regional area.
- Retail service delivery systems are readily available to geographies and individuals of different income levels in the full-scope AA.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Michigan

The state of Michigan is Chase's fifth largest rating area based on aggregate deposits of \$44.6 billion, representing 3.2 percent of the bank's total deposits. As of December 31, 2019, the bank operated 209 branches and 479 deposit-taking ATMs within the rating area, representing 4.2 percent of total branches and 3.0 percent of total ATMs. The bank originated and purchased approximately \$16.2 billion in loans or 2.3 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 118 banks operating 2,426 branches in the state of Michigan. Chase ranked first in deposit market share with 19.6 percent. Other major banks and their deposit market share are Comerica Bank (12.8 percent), Bank of America, N.A. (10.1 percent), and PNC Bank, N.A. (7.5 percent).

Chase has seven AAs in the state of Michigan and the Detroit-Warren-Ann Arbor, MI CSA (Detroit CSA) was selected for a full-scope review. The CSA consists of the Detroit-Warren-Dearborn, MI MSA, which includes the following MDs: Detroit-Dearborn-Livonia, MI MD and Warren-Troy-Farmington Hills, MI MD. It also includes the following MSAs: Ann Arbor, MI MSA and Flint, MI MSA. The Grand Rapids-Wyoming-Muskegon MSA, Kalamazoo-Battle Creek-Portage CSA, Lansing-East Lansing-Owosso MSA, Niles-Benton Harbor MSA, Saginaw MSA, and Michigan Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of the AAs.

Description of Full-Scope AA

²⁰ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provides a summary of the demographic that includes housing and business information for the Detroit CSA. Table A indicates that the volume of OOU is very small in low-income CTs and over 23.0 percent of families in the AA are low-income with 12.8 percent below the poverty level. The median housing value in the Detroit CSA ranges from two to three times the median income, three times the moderate-income and five times the low-income, indicating a limited proportion of OOU are affordable to low-income borrowers. 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.

In the Detroit CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$26,367 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$74,442 mortgage loan with a payment of \$791 per month; a moderate-income borrower earning \$42,186 per year (or less than 80 percent of the FFIEC adjusted median family income in the CSA) could afford a \$149,890 mortgage loan with a payment of \$1,266 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Detroit-Warren-Ann Arbor MI CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,532	13.8	24.7	32.2	27.2	2.2
Population by Geography	5,066,382	10.7	22.9	34.5	31.5	0.5
Housing Units by Geography	2,231,676	12.4	24.6	33.9	28.8	0.4
Owner-Occupied Units by Geography	1,346,141	6.3	19.4	37.6	36.6	0.1
Occupied Rental Units by Geography	620,142	19.7	31.2	30.3	18.0	0.8
Vacant Units by Geography	265,393	26.2	35.3	23.2	14.3	1.1
Businesses by Geography	323,836	8.0	19.8	32.8	38.4	1.1
Farms by Geography	8,468	4.6	16.5	44.5	34.1	0.2
Family Distribution by Income Level	1,267,143	23.0	16.6	19.1	41.3	0.0
Household Distribution by Income Level	1,966,283	25.2	15.6	17.0	42.3	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$87,331	Median Housing Value			\$130,778
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$52,733	Median Gross Rent			\$864
Median Family Income MSA - 22420 Flint, MI MSA		\$53,333	Families Below Poverty Level			12.8%
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$76,739				
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics October 2019 Report, the Detroit area's strengths include high housing affordability and a concentration of auto industry headquarters; production; and research and development. However, the area suffers from a below-average quality of life; eroding infrastructure; a challenging fiscal situation in the city; and persistent out migration. After nearly a decade of growth, the area economy is taking a breather. The unemployment rate has remained historically low, in the low 5.0 percent range, for the past year, but the labor force is no longer rising. Employment has slipped since the start of the year. Softness is widespread across industries, although losses have been particularly painful in healthcare and professional/business services. Investments by the logistics industry will keep transportation/warehousing payrolls moving in the right direction. Detroit has a high concentration of jobs in transportation/warehousing. Construction of the Gordie Howe International Bridge between Detroit and Windsor, Canada, which is slated for completion in 2024, will spur more traffic and growth in transportation-related industries. The auto industry is also very important to the Detroit economy with the three major automakers employing more than 117,000 people combined.

Major employment industries in the Detroit area include education and health services; professional and business services; and manufacturing. Major employers in in the area include Ford Motor Company; General Motors; University of Michigan; Chrysler Group LLC. Population trends in Detroit are weak. While net outflows have narrowed in recent years, the secular decline of manufacturing and low and falling living standards continues to weigh on Detroit's attractiveness. Household formation has flatlined and will reduce the need for additional housing supply. Sales of single-family homes have been flat and starts are trending lower.

Community Contacts

Examiners considered three community contacts completed during the period with entities serving the area. The contacts were with organizations focused on affordable housing, economic development and community and social services. Contacts indicated that there are multiple economies at work in the Greater Detroit area and that Detroit was doing much worse than other Southeast Michigan cities as it relates to unemployment, workforce development, education, transportation, access to affordable housing and small business lending. Contacts noted that there were high concentrations of poverty in the area. Many residents reside in food deserts and are food insecure. Many of the available affordable housing units are substandard. Other needs identified in the community include access to affordable home renovation financing, adult literacy training, job training/workforce development, access to affordable childcare services for low- and moderate-income households, transportation assistance for low-income households, financial education programs and services targeted to individuals re-entering the community from the penal system, access to capital for small businesses, water infrastructure replacement and improvements, elimination of vacant and blighted properties, affordable housing (rental and owner-occupied) and credit counseling and credit repair.

Contacts noted that there are numerous opportunities available for banks to support the needs of the community including providing grant funding to support the programs and services of area non-profits; more collaboration with financial intermediaries, such as Community Development Financial Institutions; and offering flexible products and services that help bring low-income individuals into the financial mainstream.

Scope of Evaluation in Michigan

The Detroit CSA received a full-scope review. The CSA accounts for 89.5 percent of deposits and 75.0 percent of the lending in the state. The remaining six AAs received a limited-scope review. Performance in limited-scope AAs that affected the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit CSA is good. Overall good lending levels and borrower distribution of loans offset weaker adequate geographic distribution of loans. The bank's leadership in making CD loans affected the rating positively while product innovation and flexibility were also considered favorably.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 34.7 percent and 64.6 percent of the loan volume in the state by number and 75.1 and 20.1 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.68 percent of the loan volume in the state by number and 0.13 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Detroit-Warren-Ann Arbor, MI CSA	49,598	88,481	525	71	138,675	75.0	89.5
Grand Rapids-Wyoming-Muskegon, MI CSA	7,033	16,026	237	9	23,305	12.6	4.9
Lansing-East Lansing-Owosso, MI	2,742	4,141	108	2	6,993	3.4	1.6
Saginaw, MI MSA	592	1,391	38	0	2,021	1.1	0.7
Niles-Benton Harbor, MI MSA	981	1,865	78	1	2,925	1.6	0.6
Kalamazoo-Battle Creek-Portage, MI CSA	1,091	2,544	58	1	3,694	2.0	0.5
Michigan Non-MSA	2,369	5,487	219	2	8,077	4.4	2.3
Total	64,406	119,935	1,263	86	185,690	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Detroit-Warren-Ann Arbor, MI CSA	9,710,881	2,365,542	9,327	635,591	12,721,341	79.0	89.5
Grand Rapids-Wyoming-Muskegon, MI CSA	1,156,029	422,402	2,390	53,815	1,634,636	10.2	4.9
Lansing-East Lansing-Owosso, MI	399,321	121,748	1,152	18,800	541,021	2.6	1.6
Saginaw, MI MSA	65,227	61,865	828	39,816	167,736	1.0	0.7
Niles-Benton Harbor, MI MSA	243,572	65,338	2,239	0	311,149	2.0	0.6
Kalamazoo-Battle Creek-Portage, MI CSA	188,068	82,701	610	6,730	278,109	1.7	0.5
Michigan Non-MSA	424,042	141,826	4,737	1,850	572,455	3.6	2.3
Total	12,187,140	3,261,422	21,283	756,602	16,226,447	100	100

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

Chase ranked first in deposits of 47 institutions with market share of 30.9 percent.

In overall HMDA lending, Chase ranked second with 5.8 percent market share. This is a highly competitive market with 695 mortgage lenders. No lender dominated the mortgage market. Other major home lenders with respective market shares are Quicken Loans (8.3 percent), Huntington National Bank (4.7 percent), and Wells Fargo Bank, N.A. (3.9 percent).

Chase ranked second in small loans to businesses with 19.5 percent market share. There are 167 lenders in the CSA. Other major lenders are American Express National Bank (20.6 percent), Citibank, N.A. (11.5 percent), and Bank of America, N.A. (6.6 percent).

Chase ranked first in small loans to farms with 30.8 percent market share. There were 24 lenders in the CSA. Other major lenders and market share are John Deere Financial, F.S.B. (18.6 percent), U.S. Bank, N.A. (13.8 percent) and Huntington National Bank (9.7 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (6.3 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (695 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was significantly below the proportion of OOUs in those geographies and well-below aggregate distribution of loans. The proportion of loans in moderate-income areas was below the proportion of OOUs in those geographies and near to the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. The proportion of loans in low-income geographies is significantly below the proportion of OOUs in those geographies and near to the aggregate distribution of loans. The proportion of loans in moderate-income geographies is well-below the proportion of OOUs and near to 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- During the 2017 to 2019 period, the proportion of loans to small businesses in low- and moderate-income geographies was well-below and below the proportion of businesses in low- and moderate-income geographies and below the aggregate distribution of loans in those areas.
- The performance during the 2014 to 2016 time periods was consistent with 2017-2019. Between 2014 and 2016, the proportion of loans to small businesses in low- and moderate-income geographies was well-below and below the proportion of businesses in low- and moderate-income geographies and near to the aggregate distribution of loans in those areas.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (4.6 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Farm lending is not a focus of the bank, therefore, examiners placed greater significance on performance compared to aggregate of lender. Chase ranked first in deposit market share with 30.8 percent amongst the high level of competition in the AA (24 lenders).
- Between 2017 and 2019, the bank did not make any loans to small farms in low-income geographies and the proportion of loans to small farms in low-income geographies significantly below the proportion of farms in those geographies and the aggregate distribution.
- Between 2017 and 2019, the proportion of loans to small farms in moderate-income geographies was well-below to the proportion of farms in those geographies and below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was better than the performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and exceeded the aggregate distribution. The proportion of loans to small farms in moderate-income geographies near to the proportion of farms in those geographies and exceeded the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the bank.

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 bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loans originations and purchases is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was near to the aggregate distribution.

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 bank's origination and purchase of small loans to businesses

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.
- Performance against both the aggregate and borrower distribution in 2014 through 2016 were consistent with 2017-2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and significantly exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Michigan 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and substantially exceeded the aggregate distribution.

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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

There were 71 CD loans made for a total of \$635 million. This represents 12.4 percent of tier 1 capital allocated to the AA. The majority of the CD loans, 71.8 percent, were for community service purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In August 2016, Chase renewed a \$100 million line of credit to a foundation based in Troy, MI. Funding was used for general working capital and for work to expand opportunities in Detroit through grant making and investing in arts and culture, education, the environment, health, human services, and community development efforts, particularly in the city of Detroit.
- Chase made 26 loans over the period to Detroit Public Schools, amounting to \$19.7 million, to continue their effort to implement best practices regarding curriculum, academic intervention, and school improvements. The school system has 74.2 percent of the students who are eligible for the Federal Free or Reduced Lunch program.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 11,342 loans totaling nearly \$1.6 billion in the AA. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	2,495	402,973
FHA	2,972	336,025
HARP	2,153	272,624
VA	772	148,645
SBA	521	149,041
USDA	2,429	299,623

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids-Wyoming-Muskegon MSA, Kalamazoo-Battle Creek-Portage CSA, Lansing-East Lansing-Owosso MSA, Niles-Benton Harbor MSA, Saginaw MSA, and Michigan Non-MSA is weaker than the bank's overall good performance under the Lending Test in the full-scope area. Performance is weaker primarily due to lower levels of CD lending.

Refer to Tables O through T 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 the state of 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.

The bank 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 current and prior period qualified investments represent 8.7 percent of tier 1 capital allocated to the AA. Nearly 94 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank investments included 46.9 percent supporting revitalization/stabilization efforts, 31.2 percent supporting community services, 20.6 percent supporting affordable housing, and 1.3 percent supporting economic development. In total, 3,214 low- and moderate-income new housing units were created, and 9,777 housing units were retained.

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. Twenty-two (29 percent of the total dollar amount) of current investments are considered complex. Additionally, 15.8 percent of the total dollar amount of prior investments still outstanding are considered complex. Both current and prior period investments are Direct Investment LIHTC transactions and NMTC financings. Of the 60 current period investments, 50 percent of the total dollar amount are considered catalyst investments that will encourage future growth and improvements or are part of local government plans for community revitalization/stabilization. The bank plays a leadership role in helping the City of Detroit strengthen its redevelopment efforts. The bank is investing \$100 million over a five-year period to accelerate blight removal, help residents prepare for new jobs and provide funds for home loans.

Qualified Investments – State of Michigan										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Detroit-Warren-Ann Arbor CSA	106	27,240	295	418,074	401	61.88	445,314	70.97	0	0
Limited Review:										
Grand Rapids-Kentwood-Muskegon CSA	34	16,866	39	69,749	73	11.27	86,615	13.80	0	0
Kalamazoo-Battle Creek-Portage CSA	14	6,853	8	25,973	22	3.40	32,825	5.23	0	0
Lansing-East Lansing-Owosso CSA	21	496	7	15,739	28	4.32	16,235	2.59	0	0
Saginaw CSA	5	295	3	399	8	1.23	695	0.11	0	0
Niles MSA	2	31	2	1,906	4	0.62	1,937	0.31	0	0
MI Non-Metro AA	9	454	9	5,186	18	2.78	5,640	0.90	0	0
Statewide Investments with Purpose, Mandate, or Function to Serve AAs	0	0	32	36,314	32	4.94	36,314	5.79	0	0
Statewide Investments with Purpose, Mandate, or Function to Serve AAs	60	1,873	2	28	62	9.57	1,901	0.30	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.

Examples of CD Investments in the AA include:

- The bank made two LIHTC investments totaling \$33.2 million for the rehabilitation of a historic, 10-story, apartment building located in Detroit. The overall project consisted of 91 units in two separately financed phases. All are affordable to low- and moderate-income senior residents. Some units are fully accessible for residents with physical impairments or for residents with hearing or visual impairments.
- The bank made two NMTC investment totaling \$11.9 million to help a company fund two capital intensive projects/new product lines in Detroit, Michigan and Toledo, Ohio. For this investment, \$5.9 million was allocated to the Detroit AA. This manufacturing capacity expansion allowed for the addition of a primary customer, supported a new product offering, and expanded assembly support for multiple automotive manufacturers. The investments serve as a catalyst for other community development activities as it is part of a local government plan for revitalization or stabilization that will encourage future growth and improvements in the area.

Statewide Investments in State of Michigan

The bank has 94 current and prior period investments totaling \$38.2 million with and without a P/M/F to serve AAs in the state of Michigan. These CD investments primarily support affordable housing with support for community services and revitalization/stabilization to a lesser extent. Qualified investments in the broader statewide or regional area represent 6.0 percent of total qualified investments in the state of Michigan. These investments enhanced the bank's overall performance in the state of Michigan.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance in the Grand Rapids-Wyoming-Muskegon CSA, Lansing-East Lansing-Owosso CSA and Kalamazoo-Battle Creek-Portage CSA is consistent with the overall excellent performance under the Investment Test in the full-scope area. Strong performance is due to a higher level of investments in relation to allocated tier 1 capital. The bank's performance under the Investment Test in the Niles-Benton Harbor MSA, the Saginaw MSA, and the Michigan Non-Metro AA is weaker than the bank's overall excellent performance under the Investment Test in the full-scope area. Weaker performance is due to a lower level of qualified investments.

SERVICE TEST

The bank's performance under the Service Test in state of 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.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low-and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Detroit CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is respectively near to and below the percentage of the population. The bank had 16 branches in low-income geographies and 24 branches in moderate-income geographies. The distribution was augmented by six MUI tract branches that serve low-income tracts and 23 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Assessment Area	Distribution of Branch Delivery System							As of December 31, 2019			
	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Detroit-Warren-Ann Arbor CSA	89.5	153	73.2	10.5	15.7	37.9	35.3	10.7	22.9	34.5	31.5

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 392 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 13.3 percent over the prior rating period to ten (4.0 percent) deposit-taking ATMs in low-income geographies and 41 (16.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings*	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Detroit-Warren-Ann Arbor CSA	0	45	-4	-7	-25	-8

(*) There is one branch closure in a geography that has not been assigned an income classification and is referred to as NA.

The bank's opening and closing of branches, has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed four branches in low-income geographies and seven branches in moderate-income geographies. Branch closures were due to the bank's strategy to exit the market, reduced customer usage, and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA due to the proximity of branches in MUI tracts used by individuals in low- and moderate-income tracts.

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. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided 3,844 CD service activities to 100 organizations, logging 27,704 qualified hours which benefitted more than 12,700 low- and moderate-income individuals. All of the bank's assistance were to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were responsive to the community needs in the AA, particularly homeownership counseling and financial literacy. The following are examples of CD services provided:

- The bank was responsive to a significant need in the AA by providing more than 210 financial literacy training sessions to more than 5,300 low- and moderate-income individuals. The bank partnered with a non-profit organization to provide financial capability and literacy education programs for citizens re-entering society after incarceration.

- The bank provided 142 homebuyer workshops and seminars to 4,211 low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Lansing-East Lansing-Owosso, MI and MI Non-Metro AAs is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Grand Rapids-Kentwood-Muskegon, MI; Kalamazoo-Battle Creek-Portage, MI; Niles-Benton Harbor MI; and Saginaw-Midland-Bay City, MI AAs is weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Nevada

CRA rating for the State of Nevada²¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- An adequate geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD loans that positively affected the rating
- The extensive use of innovative/flexible products that positively affected the rating.
- An excellent level of CD investments that displayed excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex qualified investments.
- Retail service delivery systems that are reasonably accessible to geographies and individuals of different income levels.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Nevada

The state of Nevada is Chase's 18th largest rating area based on its total deposits of \$4.3 billion, representing 0.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 56 branches and 179 deposit-taking ATMs within the rating area, representing 1.1 percent of total branches and 1.1 percent of total ATMs. The bank originated and purchased approximately \$4.2 billion in loans or 0.6 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 50 banks operating 492 branches in the state of Nevada. The bank maintained 52 offices with deposits of \$4.3 billion ranking it 9th in deposit market share with 1.6 percent. Charles Schwab Bank was ranked 1st in deposit market share with 69.9 percent, followed by Wells Fargo Bank, N.A. with 6.7 percent and Bank of America, N.A. with 5.7 percent.

The bank delineated two AAs in the state of Nevada. The Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA) accounts for 97.0 percent of the bank's deposits and 98.8 percent of loans in Nevada and received a full-scope review. The Reno MSA received a limited-scope review. The delineated AAs are described in appendix A.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Las Vegas MSA. Table A indicates that the volume of OOU's is small in low-

²¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

income census tracts (1.9 percent) and over 20.7 percent of families in the AA are low-income. The Las Vegas MSA's cost of housing also limits access to affordable homeownership among LMI borrowers. The median housing value in the Las Vegas MSA is 2.8 times the median income, 3.5 times the moderate-income, and 5.6 times the low-income, indicating a proportion of OOUs are unaffordable to most low-income and many moderate-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Las Vegas MSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$29,997 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$91,774 mortgage with a payment of \$900 per month; a moderate-income borrower earning \$47,994 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$177,575 mortgage with a payment of \$1,440 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 332 Las Vegas-Henderson NV-AZ CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	129,471	3.6	21.3	38.2	36.2	0.6
Farms by Geography	1,830	2.3	19.9	41.3	36.4	0.1
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$169,213
			Median Gross Rent			\$1,032
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the November 2019 Moody's Analytics Report, tourism is a key driver of the economy in the area led by gaming and entertainment. Las Vegas visitor volume is up 0.5 percent year to date through October, better than the 1.0 percent drop during the same period in 2018. Hotel occupancy is

rebounding, and gaming revenue is increasing. Furthermore, \$16.2 billion in tourism-related construction projects are scheduled to be completed over the next five years. Construction employment is rising and while it accounts for only 7 percent of employment in the area, it is responsible for 60.0 percent of the jobs created over the last year. Construction will remain a vital secondary driver of the economy. Major employment industries include leisure and hospitality services; professional and business services; and retail trade. Major employers in the area include MGM Resorts International; Caesar's Entertainment Corp; Station Casino Inc.; and Wynn Las Vegas LLC.

Moody's Analytics also states that after rising at one of the fastest paces among metro areas last year, house price appreciation in the area recently dipped below the U.S. average. Inventory has improved over the past year, but a four-month supply of homes for sale is still well below the six-month supply in a balanced market. Many potential homebuyers were priced out of the market last year as house prices rose twice as fast as incomes. An increase in construction of more affordable homes and multifamily units will support home sales over the near term.

Community Contacts

A review was conducted of three community contacts completed during the examination period. The contacts were completed with organizations focused on affordable housing and small business support. Contacts noted that the area is experiencing strong economic growth which is leading to a higher cost of living. Much of the housing that is being constructed is geared towards middle and upper-income borrowers making it more difficult for first time home buyers and low-income households to secure long term housing. Contacts also noted that there are opportunities available for area banks to provide support for small businesses. Identified community needs include:

- Financing for small businesses with a particular emphasis on smaller dollar loans and loans for start-up businesses
- Affordable multi-family housing development
- Flexible first-time home buyers' programs, including down payment assistance programs

Scope of Evaluation in Nevada

The rating for the state of Nevada is based on an evaluation of the bank's performance in AAs as listed in appendix A. The Las Vegas MSA AA accounts for a significant majority, 97.0 percent, of the bank's deposits in Nevada and received a full-scope review. The remaining AA in the state of Nevada received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

The bank's performance under the Lending Test in the state of Nevada is rated High Satisfactory.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA is good. Overall good lending levels, good borrower distribution of loans and a relatively high level of CD lending, offset weaker adequate geographic distribution. Product innovation and flexibility was considered favorably when determining the rating.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.3 percent and 68.4 percent of the loan volume in the state by number and 85.6 and 13.3 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.1 percent of the loan volume in the state by number and 0.02 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% State Deposits
Las Vegas-Henderson-Paradise MSA	14,524	31,843	83	7	46,457	98.8	97.0
Reno MSA	189	352	9	0	550	1.2	3.0
Total	14,713	32,195	92	7	47,007	100.0	100.0

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% State Deposits
Las Vegas-Henderson-Paradise MSA	3,552,157	558,962	1,030	48,712	4,160,861	98.0	97.0
Reno MSA	80,779	4,258	110	0	85,147	2.0	3.0
Total	3,632,936	563,220	1,140	48,712	4,246,008	100.0	100.0

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

Chase ranked fifth in deposits out of 42 institutions with 6.8 percent market share.

In overall home mortgage lending, Chase ranked sixth out of 551 lenders with a 2.9 percent market share. Other lenders in the market include Wells Fargo Bank, N.A. (8.8 percent), U.S. Bank, N.A. (7.7 percent), and Quicken Loans (4.8 percent).

In small loans to businesses, Chase ranked first out of 140 lenders with 15.3 percent market share. Other major lenders are Wells Fargo Bank, N.A. (14.4 percent), American Express National Bank (14.1 percent), and Bank of America, N.A. (10.8 percent).

In small loans to farms, Chase ranked first out of ten lenders with a 31.8 percent market share. The other major lenders are Wells Fargo Bank, N.A. (23.8 percent), U.S. Bank, N.A. (23.8 percent), and Bank of America, N.A. (9.5 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Examiners considered the limited proportion of housing units in low-income geographies, particularly OOUs (1.9 percent), which constrained lending opportunities.
- The high level of competition in the AA was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas was below the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below both the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Examiners considered the small proportion of businesses in low-income geographies (3.6 percent) and competition between lenders.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.

- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below the proportion of businesses and below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was well below the proportion of businesses and below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is excellent. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies, (2.3 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low- and moderate-income geographies exceeded both the proportion of farms in those geographies and the aggregate distribution of all lenders.
- During 2014 to 2016, the proportion of loans to small farms in low- and moderate-income geographies exceeded both the proportion of farms in those geographies and the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was near to the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank 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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated seven CD loans totaling \$48.7 million. This represents 9.0 percent of the tier 1 capital allocated to the AA. All CD loans were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In July 2018, Chase originated a \$10.0 million construction loan for the renovation of a 100-unit public housing complex. The project consists of 19 one-story apartment buildings. Seniors occupy the rental units, with 80 units to be rent restricted at 30 percent to 50 percent of the AMI and 20 units are covered under a 20-year HAP project-based Section 8 contract. Southern Nevada Regional Housing Authority (SNRHA) is the Sponsor and will also serve as the property manager. The mission of HAP is to develop low-income housing for eligible residents of the Las Vegas area.
- In September 2019, Chase originated a \$9.8 million construction loan to renovate affordable apartment units located in Las Vegas. The project consists of 125 units, with 117 units rent restricted to low- and moderate-income individuals and or families. Sixty-six units will undergo substantial renovation and 59 units will require minimal upgrades. A mix of elderly, non-elderly, and disabled individuals currently occupy the units. A 20-year HAP project-based Section 8 contract will cover all units.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As outlined below, a total of 2,982 loans were funded totaling \$594.0 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	381	74,956
FHA	1,015	163,673
HARP	729	104,682
VA	634	157,176
SBA	161	83,284
USDA	62	10,225

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on a limited-scope review, the bank's performance under the Lending Test in the Reno MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area due to weaker borrower distributions and no CD lending activity.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 13.9 percent of tier 1 capital allocated to the AA. A significant majority, or 77.6 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA. Seventy percent of the bank's CD investments focused on affordable housing, which is an identified credit need in the AA. Additionally, the bank provided 11 grants totaling \$400,000 to a variety of organizations that primarily support community service and economic development needs. All prior period investments are related to LIHTC investments that support affordable housing.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Exclusive of grants, the bank made 10 current period CD Investments that included seven complex NMTC investments and LIHTC projects. NMTC funding serve as catalysts for revitalization or stabilization that encourages future economic development, while LIHTC projects include participations from federal and state governments, local housing agencies, and real estate developers.

Examples of CD investments in the AA include:

- The bank invested \$12.0 million in a LIHTC fund for affordable housing development in the AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform

through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination, it monitors construction quality, lease-up and performance of the property through stabilization. Finally, the bank manages the asset for the entire fifteen- year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.

- The bank made three grants totaling \$100,000 to an entity that is responsive to the need of preparing low- and moderate-income job-seekers for middle skills jobs through employer partnership pipelines and/or on-the-job technical skills training in order to maximize the quality of life for each individual served. This promotes economic stability for low- and moderate-income individuals in the bank's AA.

Qualified Investments -State of Nevada										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Las Vegas-Henderson-Paradise MSA	16	17,821	21	57,296	37	60.6	75,117	87.4	0	0
Limited Review:										
Reno MSA	7	7,006	2	1,506	9	14.8	8,513	9.9	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	10	2,184	10	16.4	2,184	2.6	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	3	27	2	80	5	8.2	107	0.1	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.

Statewide Investment in the State of Nevada

The bank has qualified investments throughout the state of Nevada whose P/M/F include serving the AAs. Thirty-four percent support affordable housing, 58 percent support community services, and eight percent support economic development. Investments with no P/M/F to serve AAs support affordable housing. Investments with and without a P/M/F to serve AAs represent 26.7% of total state qualified investments. The investments all address an identified community development need. These investment in the broader statewide area further support the bank's overall excellent performance under the Investment Test in state of Nevada.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AA was factored into the state's overall Outstanding Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on a limited-scope review, the bank's performance under the Investment Test in the Reno MSA AA is consistent with the bank's overall excellent performance under the Investment

Test in the full-scope area. Performance in the limited-scope area did not impact the bank's Investment Test rating for the state of Nevada.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is adequate. In low- and moderate-income geographies, the distribution is respectively well below and below the percentage of the population. The bank had no branches in low-income geographies and eight branches in moderate-income geographies. The distribution was augmented by seven MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Las Vegas-Henderson MSA	100	49	100	0.0	16.3	49.0	34.7	5.0	25.3	39.2	30.3

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 153 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in moderate-income geographies by 47.8 percent over the prior rating period to 34 (22.2 percent). There were no deposit-taking ATMs in low-income geographies. However, bank-provided data on use of online, mobile, and telephone banking systems showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Las Vegas-Henderson MSA	4	4	0	-1	0	+1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in the low-income geographies and closed one branch in a moderate-income geography. Branch closures were due to reduced customer usage and unprofitability. Despite the branch closures, branch locations remained generally accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 243 qualified CD service activities to 29 organizations since the last evaluation, logging a total of 1,032 hours. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were very responsive to the community needs in the AA, particularly affordable housing, and financial literacy. The following are examples of CD services provided:

- The bank provided financial incentives to 108 low- and moderate-income homebuyers to take homebuyer education from third-party organizations.
- Eighteen bank employees provided financial literacy training to low- and moderate-income participants of a national nonprofit whose program teaches students the basic concepts of financial literacy as it relates to everyday economics and how they apply this information into adulthood.

Conclusions for Area Receiving a Limited-Scope Review

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on a limited-scope review, the bank's performance under the Service Test in the Reno MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of New York

CRA rating for the State of New York²²: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- A good level of lending activity.
- An adequate geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD loans that positively affected the rating
- The extensive use of innovative/flexible products that positively affected the rating.
- An excellent level of CD investments that displayed excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex qualified investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in New York

The state of New York is Chase's 20th largest rating area based on its total deposits of \$4.1 billion, representing 0.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 38 branches and 71 deposit-taking ATMs within the rating area, representing 0.7 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$1.2 billion in loans or 0.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data as of June 30, 2019, there were 211 banks operating 4,795 branches in the state of New York. The bank-maintained 702 offices with deposits of \$573.7 billion in the state, ranking 1st in deposit market share with 32.9 percent. Major competitors in the state include The Bank of New York Mellon with 7.1 percent market share, Citibank, N.A. with 6.3 percent market share, and HSBC Bank with 6 percent market share.

The bank delineated three AAs in the state of New York. The Rochester, NY MSA (Rochester MSA), which accounts for 67.0 percent of the bank's deposits and 62.9 percent of loans in New York, received a full-scope review. The Syracuse MSA and NY Non-Metro AA received limited-scope reviews. The delineated AAs are described in appendix A.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Rochester MSA. Table A indicates that the volume of OOU's is small in low-income

²² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

census tracts (3.8 percent) and over 21.6 percent of families in the AA are low-income. The Rochester MSA's cost of housing also limits access to affordable homeownership among some low-income borrowers. The median housing value in the Rochester MSA is 1.9 times the median income, 2.5 times the moderate-income, and 3.9 times the low-income, indicating a proportion of OOU's are unaffordable to some low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Rochester MSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,878 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$110,250 mortgage with a payment of \$1,016 per month; a moderate-income borrower earning \$54,206 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$207,147 mortgage with a payment of \$1,626 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 464 Rochester-Batavia-Seneca Falls NY MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	18.3	17.0	37.8	24.5	2.5
Population by Geography	950,964	10.3	14.9	43.0	31.3	0.6
Housing Units by Geography	414,117	10.8	15.9	44.0	29.3	0.1
Owner-Occupied Units by Geography	252,842	3.8	11.9	48.0	36.2	0.0
Occupied Rental Units by Geography	127,650	21.8	22.3	36.5	19.3	0.1
Vacant Units by Geography	33,625	22.1	21.1	42.0	14.8	0.1
Businesses by Geography	56,730	10.0	13.8	41.2	34.8	0.2
Farms by Geography	1,864	2.1	9.3	58.1	30.5	0.1
Family Distribution by Income Level	235,828	21.6	16.8	19.8	41.8	0.0
Household Distribution by Income Level	380,492	24.2	16.0	17.2	42.6	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$67,757	Median Housing Value			\$132,957
			Median Gross Rent			\$821
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the September 2019 Moody's Analytics Report, the Rochester area's strengths include stability and support to high wage jobs from educational institutions and hospitals; housing that is relatively affordable; and solid educational attainment relative to other upstate and western New York

peers. However, the area does suffer from persistent out-migration from younger residents and the labor market is tightening. The area has an over dependence on legacy manufacturers such as Kodak and Xerox, which have both been steadily contracting and laying off employees. Hopes that a photonics hub would leverage the metro area's key assets and revitalize the economy are fading. The national photonics institute that was announced four years ago and was initially projected to create 6,000 jobs has been slow to launch. A photonics firm that announced plans to expand in the Rochester area just over a year ago, has changed course and is now laying off workers. Major employment industries include education and health services; government; professional and business services; and manufacturing. Anchor institutions the University of Rochester and Rochester Regional Health System are significant contributors to the local economy and major employers. Other major employers include Wegmans Food Markets; Paychex, Inc; and Rochester Institute of Technology. Moody's notes that the cost of housing in the area is relatively affordable, however, inventory is tight. The lack of homes is suppressing sales and bidding wars from potential home buyers are becoming more commonplace.

Community Contacts

A review was conducted of three community contacts completed with organizations serving the area during the examination period. One of the contacts was completed with an organization focused on affordable housing, while the other contact was the result of a listening session completed with a variety of organizations serving the community. These organizations focused on areas such as affordable housing; workforce development; community services; community advocacy; and financial education. Contacts noted that the area has a tight housing supply which makes it difficult for the neediest residents to find decent and affordable housing. The area has a high poverty rate and the percentage of children in Rochester who live in poverty is among the highest in the country. Contacts noted that there is a significant need for affordable mortgage loans for low- and moderate-income borrowers; loans for smaller sized businesses, and affordable auto loans for low-income individuals, particularly for those who have had past credit challenges. Contacts also noted the need to support revitalization and stabilization efforts in low- and moderate-income neighborhoods in the area. There is also a significant need for community development loans, investments, and services in the City, with many opportunities for banks to be more engaged.

Scope of Evaluation in New York

The rating for the state of New York is based on an evaluation of the bank's performance in AAs as listed in appendix A. The Rochester MSA accounts for 67.0 percent of the bank's deposits in New York and received a full-scope review. The remaining two AAs in the state of New York received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating.

Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rochester MSA is good. Overall good lending levels, good borrower distribution of loans and a relatively high level of CD lending, offset weaker adequate geographic distribution. Product innovation and flexibility was considered favorably when determining the rating.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 21.1 percent and 77.3 percent of the loan volume in the state by number and 60.2 and 33.6 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 1.4 percent of the loan volume in the state by number and 0.30 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Rochester, NY MSA	2,758	12,613	216	10	15,597	62.9	67.0
Syracuse, NY MSA	2,217	5,656	105	7	7,985	32.2	29.7
NY Non-Metro AA	268	908	36	3	1,215	4.9	3.2
Total	5,243	19,177	357	20	24,797	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Rochester, NY MSA	381,560	231,278	2,108	37,825	652,771	55.8	67.0
Syracuse, NY MSA	278,011	147,192	451	19,785	445,439	38.1	29.7
NY Non-Metro AA	45,106	15,333	972	10,190	71,601	6.1	3.2
Total	704,677	393,803	3,531	67,800	1,169,811	100	100

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

Chase ranked second in deposits out of 19 institutions with 14.3 percent market share.

In overall home mortgage lending, Chase ranked 16th out of 279 lenders with a 2.2 percent market share. Other lenders in the market include ESL Federal Credit Union (17.6 percent), Wells Fargo Bank, N.A. (7.5 percent), and Premium Mortgage Corporation (5.8 percent).

In small loans to businesses, Chase ranked second out of 96 lenders with 17.3 percent market share. Other major lenders are M&T Bank (21.6 percent), Canandaigua National Bank (15.5 percent), and KeyBank National Association (6.9 percent).

In small loans to farms, Chase ranked third out of 17 lenders with a 15.5 percent market share. The other major lenders are USNY Bank (27.0 percent), John Deere Financial, F.S.B. (18.1 percent), and Community Bank, N.A. (10.1 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 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the limited proportion of housing units in low-income geographies, particularly OOU's (3.8 percent), which constrained lending opportunities.
- The high level of competition in the AA was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas was well below the percentage of owner-occupied units and aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and near to the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was well below both the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was near to the percentage of owner-occupied units and exceeded the aggregate distribution of loans.

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.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is adequate. The following information was taken into consideration when determining this rating.

- Examiners considered the small proportion of businesses in low-income geographies (10.0 percent) and competition between lenders.

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in low- and moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was well below the proportion of businesses and below the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was well below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (2.1 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.
- During 2014 to 2016, the proportion of loans to small farms in low- and moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was near to the aggregate distribution.
- During 2014 to 2016 the proportion of loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was below the aggregate distribution.

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 bank's origination and purchase of small loans to businesses.

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank 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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 10 CD loans totaling \$37.8 million, which represents 11.0 percent of the tier 1 capital allocated to the AA. The majority of the CD loans, or 65.3 percent, were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In October 2019, Chase originated a \$7.4 million construction loan to partially finance the development of an apartment complex located in Brockport, NY (Monroe County). The project will consist of 48 units of affordable housing available to households earning between 50 percent and 60 percent of the AMI. There will be eight units set aside for persons with physical disabilities and/or traumatic brain injuries with supportive services to be provided for them.
- In March 2017, Chase originated an \$8.8 million loan for the construction and rehabilitation of affordable housing in a low-income region of Rochester, NY. The project includes an existing three-story building, which was converted from a commercial space to residential units. The property will contain a total of 72 mixed-income affordable units with 68 units being restricted to 60 percent of the AMI. In addition, 16 of the units are set aside for tenants with intellectual and developmental disabilities.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank originated 774 loans totaling \$80.4 million in the AA.

Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	131	14,492
Federal Housing Administration (FHA)	273	24,052
U.S. Department of Agriculture (USDA)	256	25,977
Veteran's Administration (VA)	67	10,792
Home Affordable Refinance Program (HARP)	34	3,169
Small Business Administration (SBA)	13	1,968

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance in the Syracuse MSA and NY Non-Metro AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T 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 the state of New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 27.5 percent of tier 1 capital allocated to the AA. A significant majority, or 94.6 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the community development needs in the AA including affordable housing and community services for low- and moderate-income individuals and geographies. All of the bank's current and prior period CD investments focused on affordable housing, an identified credit needs in the AA. Additionally, the bank provided 25 grants totaling \$1.6 million to a variety of organizations that primarily support community service needs. In total, the bank's investments helped create 955 and retain 1,808 low- and moderate-income affordable housing units.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Exclusive of grants, the bank made six current period and one prior complex CD investments. These include five complex Direct Investment LIHTC transactions, where the bank manages the asset throughout the holding period using in-house expertise, and one transaction supporting a construction and rehabilitation of a 52-unit housing unit building in a low-income area.

Examples of CD investments in the AA include:

- The bank made a \$12.5 million single Direct Investment LIHTC transaction to an organization that provided 160 rental units to low- and moderate-income individuals and families.
- The bank made six grants totaling \$286,000 to an entity that creates new low- and mid-skilled job opportunities in low- and moderate-income neighborhoods. The entity creates an accelerator to develop a pipeline of businesses that are investment ready. The program identifies businesses that are located or will locate in higher poverty neighborhoods and bring needed job opportunities for low- and mid-skill workers living in those low- and moderate-income communities. The majority of the business participants are low- and moderate-income individuals.

Qualified Investments – State of New York										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Rochester MSA	27	5,226	42	91,852	69	21.2	97,077	15.3	0	0
Limited Review:										
Syracuse MSA	9	355	32	74,376	41	12.6	74,731	11.7	0	0
NY Non-Metro AA	2	509	3	43,246	5	1.6	43,755	6.9	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	34	23,671	95	358,212	129	39.7	381,884	60.0	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	67	22,356	14	16,585	81	24.9	38,941	6.1	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.

Statewide Investments in the State of New York

The bank has qualified investments throughout the state of New York whose P/M/F includes serving the AAs. Ninety-five percent support affordable housing, four percent support revitalization/stabilization, one percent support community service and one small investment supports economic development. Investments with no P/M/F to serve AAs support affordable housing, economic development, and community services. Investments with and without a P/M/F to serve AAs represent 58.9 percent of total state qualified investments. These investment in the broader statewide area further support the bank's overall excellent performance under the Investment Test in state of New York.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Syracuse MSA and the NY Non-Metro AA is consistent with the bank's overall excellent performance under the Investment Test in the full-scope area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is respectively near to and exceeds the percentage of the population. The bank had two branches in low-income geographies and six branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves low-income tracts and one MUI tract branch that serves moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Rochester-Batavia-Seneca Falls CSA	67.0	23	60.5	8.7	26.1	34.8	30.4	10.3	14.9	43.0	31.3

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 45 deposit-taking ATMs, online banking,

mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 45.5 percent over the prior rating period to three (6.7 percent) deposit-taking ATMs in low-income geographies and 13 (28.9 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Rochester-Batavia-Seneca Falls CSA	0	4	-1	0	-2	-1

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and did not open or close any branches in moderate-income geographies. The branch closure in the low-income geography was due reduced customer usage and unprofitability. Despite the branch closure, branch locations in general remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Generally, branches are open Monday through Friday from 8:30 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 233 CD service activities to 15 organizations since the last evaluation, logging a total of 1,044 qualified hours. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's CD services were very responsive to the community needs in the AA, particularly affordable housing. The following are examples of CD services provided:

- The bank provided financial incentives to 70 low- and moderate-income homebuyers to take homebuyer education from third-party organizations. Successfully completing the pre-purchase homebuyer education curriculum provides low- and moderate-income customers tools and resources to become financially successful homeowners.
- Eight bank employees provided technical assistance to the local office of a statewide nonprofit whose vision is to achieve social and economic justice for the people of New York State who are poor, disabled, or disenfranchised.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the NY Non-Metro AA is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Syracuse MSA is good and weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution.

State Rating

State of Ohio

CRA rating for the State of Ohio²³: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- Overall adequate geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- Few, if any CD loans which has a negative effect on the Lending Test rating.
- The extensive use of flexible products, which positively affected the rating.
- An excellent level of qualified investments, excellent responsiveness to credit and community economic development needs, and qualified investments provided in a broader statewide or regional area.
- Retail service delivery systems are readily accessible to geographies and individuals of different income levels.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Ohio

The state of Ohio is Chase's ninth largest rating area based on aggregate deposits of \$27.3 billion, representing 2.0 percent of the bank's total deposits. As of December 31, 2019, the bank operated 214 branches and 499 deposit-taking ATMs within the rating area, representing 4.3 percent of total branches and 3 percent of total ATMs. The bank originated and purchased approximately \$12.6 billion in loans or 1.8 percent of total bank loan originations and purchases during the evaluation period in the state.

According to the FDIC Deposit Market Share Data, as of June 30, 2019, there were 188 banks operating 2,999 branches in the state of Ohio. Chase ranked second in deposit market share with 11.5 percent. Major competitors in the state based on deposit market share include Huntington National Bank (21.3 percent), PNC Bank, N.A. (10.2 percent), and KeyBank (9.9 percent).

Chase has delineated nine AAs in the state of Ohio. The Columbus-Marion-Zanesville, OH CSA was selected for a full-scope review. The CSA consists only of the Columbus, OH MSA. The Cleveland-Akron-Canton CSA, Lima MSA, Dayton-Springfield-Sidney CSA, Mansfield MSA, Toledo MSA, Weirton-Steubenville MSA, Youngstown-Warren-Boardman MSA, and the Ohio Non-Metro AA received limited-scope reviews. The bank's performance under the Lending Test in the Refer to appendix A for a complete description of the AAs.

²³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Columbus MSA. Table A indicates that the volume of OOU's is very small in low-income CTs and over 22.3 percent of families in the AA are low-income with 10.5 percent below the poverty level. The median housing value in the Columbus MSA is three times the median income, three times the moderate-income and five times the low-income, indicating a limited proportion of OOU's are affordable to low-income borrowers. 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.

In the Columbus MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,227 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$116,713 mortgage loan with a payment of \$1,057 per month; a moderate-income borrower earning \$56,363 per year (or less than 80 percent of the FFIEC adjusted median family income in the MSA) could afford a \$217,444 mortgage loan with a payment of \$1,691 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus OH MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	433	15.2	24.5	32.6	26.8	0.9
Population by Geography	1,972,375	10.1	22.3	35.3	31.5	0.8
Housing Units by Geography	834,170	11.6	23.6	34.9	29.7	0.2
Owner-Occupied Units by Geography	465,470	5.2	18.7	38.0	38.1	0.0
Occupied Rental Units by Geography	291,050	17.9	30.2	31.6	19.9	0.4
Vacant Units by Geography	77,650	27.2	27.8	28.0	16.5	0.5
Businesses by Geography	142,477	9.0	18.3	31.2	41.1	0.5
Farms by Geography	4,485	4.5	14.9	46.8	33.8	0.1
Family Distribution by Income Level	480,828	22.3	17.1	19.6	41.0	0.0
Household Distribution by Income Level	756,520	24.2	16.4	17.2	42.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$160,150
			Median Gross Rent			\$839
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to the Moody's Analytics September 2019 report, the Columbus economy has gained ground and is now outperforming all the state's major metro areas year to date. The area's strengths include good prospects for high tech and other knowledge-based industries; favorable migration patterns and age

structure; a highly educated workforce; low-costs of living and doing business; and above-average house price growth. However, per capita income in the area is below the U.S. average and single-family residential building is weak. White collar services, healthcare, and government are driving employment in the area. Major employers in the area include Ohio State University; JP Morgan Chase; Ohio Health; and Nationwide. Housing demand in the area is strong and vacancy rates, in terms of both percentage of houses for sale and percentage of inventory for rent, are below both statewide and national averages.

Community Contacts

Examiners considered six community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on community revitalization and self-sufficiency for low-income households and individuals. Contacts noted that the population in the area is growing and because of increasing demand for housing, landlords are being more selective when screening potential tenants. As such, individuals with criminal histories, poor credit or past evictions have more difficulty in securing safe and affordable housing. Contacts also noted that despite the growing economy many families in the area are food insecure and rely on food pantries for assistance. Other needs identified by the contacts included greater access to affordable housing, small business loans, general operating support for area non-profits, affordable mortgage loans and rehabilitation loans.

Scope of Evaluation in Ohio

The Columbus MSA received a full-scope review. The MSA accounts for 50.6 percent of the deposits and 37.9 percent of the lending in the state. The remaining eight AAs in the state of Ohio received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus MSA is good based on overall excellent lending levels, adequate geographic distribution of loans and good borrower distribution of loans.

Lending Activity

Lending levels reflect excellent responsiveness to the credit needs in the bank's AA.

Examiners considered the number and amount of home mortgage, small business, small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 33.5 percent and 65.5 percent of the loan volume in the state by number and 75.4 percent and 23.5 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received

minimal weight in reaching conclusions. Farm loans represented 0.93 percent of the loan volume in the state by number 0.31 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Columbus MSA	23,585	41,312	476	6	65,379	37.9	50.6
Cleveland-Akron-Canton CSA	19,850	44,843	295	27	65,015	37.7	27.5
Dayton-Springfield-Sidney CSA	4,078	8,860	150	0	13,088	7.6	8.1
Youngstown-Warren-Boardman MSA	2,145	4,074	70	0	6,289	3.6	3.6
Lima MSA	551	1,251	46	1	1,849	1.1	1.9
Mansfield MSA	513	1,282	20	0	1,815	1.2	0.7
Toledo MSA	783	1,917	42	0	2,742	1.6	0.0
Weirton-Steubenville MSA	221	302	3	0	526	0	0.4
Ohio Non-MSA AA	6,114	9,269	507	1	15,891	9.2	7.3
Total	57,840	113,110	1,609	35	172,594	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Columbus MSA	4,654,616	1,038,236	13,191	9,826,656	15,532,699	14.2	50.6
Cleveland-Akron-Canton CSA	3,126,133	1,205,677	2,976	82,822,935	87,157,721	79.5	27.5
Dayton-Springfield-Sidney CSA	538,449	240,096	3,234	0	781,779	0.7	8.1
Youngstown-Warren-Boardman MSA	231,111	99,329	768	0	331,208	0.3	3.6
Lima MSA	61,669	54,199	4,058	2,487,445	2,607,371	2.4	1.9
Mansfield MSA	51,830	34,934	164	0	86,928	0.1	0.7
Toledo MSA	119,569	30,537	794	0	150,900	0.1	0.0
Weirton-Steubenville MSA	17,908	11,584	39	0	29,531	0	0.4
Ohio Non-MSA AA	683,956	241,895	13,813	2,040,000	2,979,664	2.7	7.3
	9,485,241	2,956,487	39,037	97,177	12,577,942	100	100

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

Chase ranked second in deposits of 55 institutions with market share of 22.3 percent.

In overall HMDA lending, Chase ranked second with 6.0 percent market share. This is a highly competitive market with 592 mortgage lenders. The top lender in this market is Huntington National Bank with 12.7 percent market share with U.S. Bank, N.A. behind Chase with 4.8 percent market share.

Chase ranked first in small loans to businesses with 25.4 percent market share. There were 139 lenders in this MSA. Other major lenders and their market share are American Express National Bank (14.7 percent), PNC Bank, N.A. (13.0 percent), and Huntington National Bank (7.4 percent).

Chase ranked second in small loans to farms 20.3 percent market share. There are 26 lenders in the MSA. The other major lender in this market is John Deere, Financial, F.S.B. with 20.5 percent market share. Huntington National Bank is ranked third with 11.9 percent market share.

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 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

Columbus MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (5.2 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (592 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income areas was near to the proportion of OOUs in those geographies and the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was inconsistent with 2017 to 2019. The proportion of loans in low- and moderate-income geographies is well below the proportion of OOUs in those geographies, and below 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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Ohio is ranked the third worst state in the country for business tax advantages.
- The overall AA scores poorly in small-business vitality.

- Between 2017 and 2019, the proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of small businesses in those areas and well-below the aggregate distribution of loans.
- The performance in low- and moderate-income geographies during the 2014 and 2016 time periods was generally consistent with 2017 to 2019. The proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of small businesses in those areas and the aggregate distribution of loans.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (4.5 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was significantly below the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms in those geographies and exceeded the aggregate distribution of all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was significantly below both the proportion of farms in those geographies and the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and below the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the performance to low- and moderate-income borrowers was near to both the proportion of low- and moderate-income families and the aggregate distribution.
- Performance in low-income geographies between 2014 and 2016 was consistent with performance in 2017 to 2019. The performance to low- and moderate-income borrowers was near to both the proportion of low- and moderate-income families and the aggregate distribution.

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 bank's origination and purchase of small loans to businesses.

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- In all time periods, the bank's distribution of small loans to businesses with revenues of \$1 million or less was below the percentage of small businesses located in the AA and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Ohio 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was generally consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was well-below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank made few, if any, CD loans in the Columbus MSA.

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

The bank originated or purchased six CD loans totaling \$9.8 million. This represents 0.6 percent of the tier 1 capital allocated to the AA. Most of the CD loans were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In May 2014, Chase provided a \$1.1 million loan for the permanent financing of a 66-unit apartment complex in Whitehall, OH. The project has LIHTC financing. All the units are restricted to seniors over 55 years up to 60 percent of the AMI. Twenty of the units were covered by HAP project-based vouchers and tenants are required to pay 30 percent of their adjusted gross incomes towards rent. Residents were also assisted with credit counseling and social services.
- In December 2014, Chase originated a \$29,800 loan to a housing authority for pre-development construction costs in Hocking County, OH. The authority administers the public housing and Section 8 voucher housing programs.
- In June 2018, Chase originated a \$5.9 million loan to finance the acquisition and substantial rehabilitation of 59 LIHTC affordable units of existing properties in Columbus, OH. All units are restricted to households earning 30 percent to 50 percent of the AMI.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. A total of 5,293 loans were funded totaling \$790.9 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	1,289	196,421
Federal Housing Administration (FHA)	1,851	237,883
U.S. Department of Agriculture (USDA)	617	82,789
Veteran's Administration (VA)	700	138,060
Home Affordable Refinance Program (HARP)	529	62,483
Small Business Administration (SBA)	307	73,246

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not change the initial overall conclusions based on the AA receiving the full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Cleveland-Akron-Canton CSA, Lima MSA, and the OH Non-Metro AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Dayton-Springfield-Sidney CSA, Mansfield MSA, Toledo MSA, Weirton-Steubenville MSA, and Youngstown-Warren-Boardman MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance was primarily due to weaker performance in the geographic distribution and lack of CD lending. Performance in the limited-scope AAs did not affect the overall Lending Test rating for the state of Ohio.

Refer to Tables O through T 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 the state of Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank 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. Current and prior period investments represent 10.6 percent of tier 1 capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs identified as affordable housing, community service, economic development, and revitalization/stabilization. A majority of total investments represent current period investments. Of the dollars invested, nearly 87.7 percent supported affordable housing, 6.8 percent supported revitalization/stabilization, and 6.1 percent supported community services. All prior period investments support affordable housing. Current and prior period affordable housing investments created 8,007 low- and moderate-income units for individuals and families. In the current period, the bank provided 69 grants totaling \$11.3 million to a variety of organizations supporting community service, revitalization/stabilization, economic development, and affordable housing. In some occurrences, grants were provided annually.

The bank rarely uses innovative and/or complex investments to support CD initiatives. Three current and prior period investments are complex, as they relate to NMTC and Direct Investor LIHTC transactions. Direct Investor transactions require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. Eight current period investments are catalysts that will encourage future growth and other improvements.

Examples of CD Investments in the AA include:

- In March 2014, the bank made a \$3.9 million NMTC equity investment for rehabilitating a vacant school in Columbus, OH into a new high school. It is a college preparatory high school exclusively for students from low-income families. Financing was used for the build-out of the classrooms and administrative space and to complete structural work on the roof and windows. Upon completion, the project was ready for full capacity occupancy of 500 students. In addition, the school created 78 full-time jobs for administrators, teachers, and staff during its first five years of operation. The bank also provided six \$500,000 grants starting in 2014 through 2019.
- From 2014 through 2019, the bank provided annual grants of \$500,000 to a community college development foundation. The first five grants were part of a total \$2.5 million commitment to continue the bank's support of the foundation's Central Ohio Compact (COC). The COC was established with the goal of being the most productive education partnership in the nation, fully able to raise education attainment levels and support the region's economic growth strategies. The COC made a regional commitment to address significant gaps between workplace requirements and

current population skill sets, as well as increase the number of individuals holding a post-secondary degree or certificate. Funds were used to hire a leadership team to coordinate with various groups throughout the community to develop plans to bring replicable models to scale; create a data collection system to align career pathways, curriculum, and credentials with regional employer demands; and provide professional development for career and guidance counselors. Sixty-nine percent of those benefiting from the program had annual earnings less than 80 percent of the AMI for the area served by the program.

The sixth \$500,000 grant is part of a 5-year, \$250 million New Skills at Work Initiative. The initiative was developed by the bank and was the largest-ever private sector initiative. The grant addressed the need for workforce development programs to increase economic stability for low- and moderate-income individuals in the Columbus, OH metropolitan area.

- From 2016 through 2019, the bank provided annual grants of \$300,000 to a hospital foundation for its Helping Families by Transforming Neighborhoods initiative, a part of their Healthy Neighborhoods, Healthy Families (HNHF) plan. HNHF is committed to making a significant, positive difference for hospital neighbors and surrounding community, including affordable housing. In response to limited availability of affordable housing tax credits, HNHF implemented a strategy to renovate existing duplexes into quality rentals for individuals and families earning 60-80 percent of AMI. There are 32 communities in the area; over 84 percent are low- and moderate-income communities. HNHF acquired and renovated 75 blighted duplexes utilizing a blend of loan financing from the hospital and the Affordable Housing Trust of Franklin County and grant dollars from the bank and the City of Columbus. These grants served as a catalyst for other community development activities supporting a local government plan for revitalization or stabilization to encourage future growth and improvements in the area.

Qualified Investments – State of Ohio										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Columbus MSA	52	76,168	142	112,536	194	24.0	188,705	21.8	0	0
Limited Review:										
Cleveland-Akron-Canton CSA	85	150,933	189	175,118	274	33.9	326,051	37.6	0	0
Dayton-Springfield-Sidney CSA	33	35,712	47	59,536	80	9.9	95,249	11.0	0	0
Lima-Van Wert-Celina MSA	0	0	4	1,872	4	0.5	1,872	0.2	0	0
Mansfield MSA	4	2,680	2	1,051	6	0.7	3,731	0.4	0	0
Toledo MSA	14	11,988	18	25,386	32	4.0	37,374	4.3	0	0
Weirton-Steubenville MSA	2	63	0	0	2	0.2	63	0.0	0	0
Youngstown-Warren-Boardman MSA	10	8,958	11	8,425	21	2.6	17,383	2.0	0	0
Ohio Non-Metro AA	11	15,298	26	40,662	37	4.6	55,960	6.5	0	0
Other:										
Statewide Investments with Purpose, Mandate or Function (P/M/F) to Serve AAs	0	0	107	86,180	107	13.2	86,180	9.9	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	51	53,987	1	40	52	66.4	54,027	6.2	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.

Statewide Investments in the State of Ohio

Statewide investments with a P/M/F to serve AAs included investments related to affordable housing and community services. Current period investments were \$85.1 million or 87.1 percent for affordable housing and \$11.1 million or 12.9 percent for community service. Affordable housing investments created 3,358 low- and moderate-income units for individuals and families. Thirty-eight grants totaling \$5.4 million were provided to a variety of organizations, primarily agencies administering financial education services. In some occurrences, grants were provided annually. The level of investments in the broader statewide area had a positive impact on the Investment Test rating for the state of Ohio.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Cleveland-Akron-Canton CSA, Dayton-Springfield-Sidney CSA, Mansfield MSA, Toledo MSA, Youngstown-Warren-Boardman MSA, and Ohio Non-Metro is consistent with the bank's overall excellent performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the Lima-Van Wert-Celina MSA and Weirton-Steubenville MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area due to a low level of qualified investments.

SERVICE TEST

The bank's performance under the Service Test in state of Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, including the data in the tables below, the bank's performance in the Columbus MSA is excellent.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is near to the percentage of the population. The bank had five branches in low-income geographies and eleven branches in moderate-income geographies. The distribution was augmented by four MUI tract branches that serve low-income tracts and 13 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Columbus MSA	50.6	67	26.1	7.5	16.4	35.8	40.3	10.1	22.3	35.3	31.5

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 212 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 4.0 percent over the prior rating period to 17 (8.0 percent) deposit-taking ATMs in low-income geographies and 35 (16.5 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Columbus MSA	2	10	0	-2	-4	-2

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch and closed one branch in low-income geographies and closed two branches in moderate-income geographies. Branch closures were due to real estate issues that resulted in poor customer experiences and reduced customer usage. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 2,427 qualified CD service activities to 45 organizations since the last evaluation, logging a total of 12,196 hours. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's CD services were responsive to the

community needs in the AA, particularly homeownership education. The following are examples of CD services provided:

- The bank provided financial incentives to 519 low- and moderate-income homebuyers to take homebuyer education. Successfully completing the pre-purchase homebuyer education curriculum provides low- and moderate-income customers tools and resources to become financially successful homeowners.
- Two hundred and twenty-five bank employees provided tax preparation assistance to 383 low- and moderate-income individuals across six years. The activity is provided in association with a nonprofit organization's sponsorship of a program that provides free tax filing assistance for individuals eligible for the Earned Income Tax Credit (EITC) and Child Tax Credit.
- Five hundred and fifty-five bank employees provided financial literacy training to low- and moderate-income participants of a national nonprofit whose program teaches students the basic concepts of financial literacy as it relates to everyday economics and how they apply this information into adulthood.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Dayton-Springfield-Kettering CSA is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Cleveland-Akron-Canton CSA, Youngstown-Warren MSA, Lima MSA, Mansfield MSA, Toledo MSA, Weirton-Steubenville MSA, and OH Non-Metro AA is weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma²⁴: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- Overall adequate geographic distribution of home mortgage loans and small loans to businesses.
- Overall good borrower distribution of home mortgage loans and small loans to businesses.
- Few, if any CD loans which has a negative effect on the Lending Test rating.
- The extensive use of flexible products, which positively affected the rating.
- An adequate level of qualified investments, good responsiveness to credit and community economic development needs, supported by an excellent level of CD investments in the limited-scope area, and the level of investments in the broader statewide area which positively affected the rating.
- Retail service delivery systems are readily accessible to geographies and individuals of different income levels.
- Chase is a leader in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Oklahoma

The state of Oklahoma is Chase's 19th largest rating area aggregate deposits of \$4.3 billion, representing 0.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 28 branches and 72 deposit-taking ATMs within the rating area, representing 0.5 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$1.7 billion in loans or 0.2 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share data, as of June 30, 2019, there were 223 banks operating 1,338 branches in the state of Oklahoma. Chase ranked sixth in deposit market share with 4.6 percent. Major competitors in the state based on deposit market share include BOKF, N.A. (13.1 percent), MidFirst Bank (7.3 percent), and BancFirst (7.3 percent).

Chase has two AAs in the state of Oklahoma and the Oklahoma City-Shawnee, OK CSA received a full-scope review. The CSA consists of only the Oklahoma City, OK MSA. The Tulsa MSA received a limited-scope review. Refer to appendix A for a complete description of the AAs.

Description of Full-Scope AA

The following table provides a summary of the demographic that includes housing and business information for the Oklahoma City MSA. Table A indicates that the volume of OOU is very small in low-income CTs (3.9 percent) and over 21.5 percent of families in the AA are low-income, with 11.5

²⁴ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

percent below the poverty level. The median housing value in the Oklahoma City MSA is two times the median income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Oklahoma City MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,254 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$102,528 mortgage loan with a payment of \$968 per month; a moderate-income borrower earning \$51,606 per year (or less than 80 percent of the FFIEC adjusted median family income in the MSA) could afford a \$194,735 mortgage loan with a payment of \$1,548 per month.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	8.4	29.8	35.2	23.8	2.7
Population by Geography	1,149,287	7.0	25.2	37.7	29.9	0.3
Housing Units by Geography	482,612	6.9	27.3	37.4	28.0	0.3
Owner-Occupied Units by Geography	270,023	3.9	19.3	40.4	36.4	0.1
Occupied Rental Units by Geography	163,706	10.7	37.9	33.7	17.1	0.7
Vacant Units by Geography	48,883	11.3	36.4	34.0	17.7	0.6
Businesses by Geography	107,446	4.5	21.8	34.8	35.7	3.2
Farms by Geography	2,687	3.4	17.3	39.7	38.6	0.9
Family Distribution by Income Level	278,956	21.5	17.3	20.3	40.9	0.0
Household Distribution by Income Level	433,729	23.5	16.7	17.9	41.8	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$139,259
			Median Gross Rent			\$808
			Families Below Poverty Level			11.5%

*Source: 2015 ACS and 2019 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.*

Economic Data

According to Moody's Analytics September 2019 Report, population growth in the area exceeds the U.S. average and has experienced positive net migration. The area has a diverse economy and a high concentration of prime age workers. However, a downturn in the energy industry is spilling into private services and weighing on the economy. Employment growth is below 1 percent for the first time since mid-2017. Fewer jobs in mining and in tightly linked professional services are sapping the area of valuable high-wage positions that support incomes and spending. Energy firms in Oklahoma have cut back on drilling. The area's energy-related industries are projected to lose more jobs in coming quarters, suggesting the economy will weaken before it improves. Over half of the major companies based in Oklahoma City are energy related. While oil prices have stabilized after a drop in the second quarter, concerns about the global economic outlook and robust domestic supplies are weighing on expectations

for future activity. Government accounts for a significant percentage of the employment in the area. The area is home to Tinker Airforce Base which is the largest employer in area. Other major employers include University of Oklahoma-Norman; FAA Mike Monroney Aeronautical Center; and Integris Health. Moody's indicates that single-family housing in the area is already more affordable than in any other southern metro area or division with at least one million residents. However, sales of single-family homes are expected to plateau soon as the economy weakens. A jump in single-family starts in the third quarter will help keep a floor under construction employment, but additional supply will hit the market the same time sales plateau, and house price appreciation will decelerate.

Community Contacts

Examiners considered two community contacts completed during the review period with entities serving the area. The contacts were with organizations focused on the unmet infrastructure needs due to multiple natural disasters in recent years with the need to repair and replace infrastructure such as roads, bridges and drainage systems that were damaged because of these disasters. While housing is generally considered affordable, there is still a need for affordable housing, particularly for low- and very-low-income individuals and households. Contacts also noted the need to support programs to assist first time home buyers as well as the need to create job opportunities for low-income individuals by expanding existing businesses and attracting new businesses. Other needs included affordable starter homes, affordable and accessible mortgages for low- to moderate-income families and a local hospital or medical care.

Scope of Evaluation in Oklahoma

The Oklahoma City MSA received a full-scope review. The area accounts for 83.0 percent of the bank's deposits and 53.2 percent of the lending in Oklahoma. The other AA received a limited-scope review. Performance in limited-scope AA that affected the CRA rating is addressed within their respective tests.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Oklahoma City MSA is adequate. Overall, excellent lending levels, adequate geographic distribution of loans and good borrower distribution of loans.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the bank's AA.

Examiners considered the number and dollar amount of home mortgage, small business, small farm originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight

in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 18.5 percent and 80.8 percent of the loan volume in the state by number and 71.1 percent and 28.6 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farms loans represented 0.7 percent of the loan volume in the state by number 0.2 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Oklahoma City MSA	4,034	19,559	203	1	23,797	56.2	83.0
Tulsa MSA	2,606	9,454	61	0	12,121	43.8	17.0
Total	6,640	29,013	264	1	35,918	100.0	100.0

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

Dollar Volume of Loans* (\$000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Oklahoma City MSA	722,759	349,706	2,888	1,800	1,077,153	62.7	83.0
Tulsa MSA	497,947	141,070	590	0	639,607	37.3	17.0
Total	1,220,706	490,776	3,478	1,800	1,716,760	100.0	100.0

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

Chase ranked second in deposits of 72 institutions with 10.4 percent market share.

In overall home mortgage lending, Chase ranked eleventh with 2.2 percent market share. This is a very competitive market with 538 mortgage lenders. The top lenders in this market were BOKF, NA (4.8 percent), Wells Fargo Bank, NA (4.5 percent), and Cornerstone Home Lending, Inc. (4.4 percent).

Chase ranked second in small loans to businesses with 12.9 percent market share. There are 126 lenders in the MSA. The major lender in this market is American Express National Bank with 19.5 percent market share.

Chase ranked second in small loans to farms 10.7 percent market share. There are 20 lenders in the MSA. The major lender in this market is Bancfirst with 42.0 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans in low-income geographies was significantly below the proportion of OOUs in those areas and below the aggregate distribution of loans. The proportion of moderate-income geographies was below the proportion of OOUs in those areas and significantly exceeded the aggregate distribution of loans.
- Performance in the low- and moderate-income geographies between 2014 and 2016 was inconsistent with the performance during the 2017-2019 period. Between 2014 and 2016, the proportion of loans in low-income geographies was significantly below the proportion of OOUs in those areas and well below the aggregate distribution of loans. The proportion of moderate-income geographies was well below the proportion of OOUs in those areas and near to the aggregate distribution of loans. The weaker performance between 2014 and 2016 did affect the 2017-2019 performance.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Between 2017-2019, the proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of businesses and the aggregate distribution of loans.
- Performance in low- and moderate-income geographies during the 2014 and 2016 time periods was consistent with 2017 to 2019 period. Between 2104 and 2016, the proportion of loans to small businesses in low- and moderate-income geographies was below the proportion of businesses. The proportion of loans to small businesses in low- and moderate-income geographies was near to aggregate distribution of loans.

Small Loans to Farms

Refer to Table S in the state of Oklahoma 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited percentage of farms in low-income geographies (3.4 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- Between 2017 and 2019, the proportion of loans to small farms in low- and moderate-income geographies was significantly below both the proportion of farms in those geographies and well below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was better than the performance during 2017 to 2019 period. Between 2014 and 2016, the proportion of loans

to small farms in low- and moderate-income geographies was below the proportion of farms in those geographies and near to the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the proportion of loans to low- and moderate-income borrowers was near to the percentage of low-and moderate-income families in the AA and exceeded the aggregate distribution of loans.
- Performance between 2014 and 2016 was consistent with the 2017-2019 period, which contributed to the overall good performance. The proportion of loans to low- and moderate-income borrowers was near to the percentage of low-and moderate-income families in the AA and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's distribution of loans to businesses with revenues of \$1 million or less was below the proportion of businesses with revenues of \$1 million or less and significantly exceeded the aggregate distribution of loans.
- Performance in the 2014 to 2016 period was consistent with the performance between 2017-2019. The bank's distribution of loans to businesses with revenues of \$1 million or less was below the proportion of businesses with revenues of \$1 million or less and significantly exceeded the aggregate distribution of loans.

Small Loans to Farms

Refer to Table T in the state of Oklahoma 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of businesses and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than the performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was well-below the percentage of businesses and below the aggregate distribution.

Community Development Lending

The bank has made few, if any, CD loans in the Oklahoma City MSA.

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

The bank made one CD loan in its AA for a \$1.8 million, which represents less than one percent of the tier 1 capital allocated to the AA.

Details of the CD loan:

- In April 2015, the bank funded a \$1.8 million construction loan to build a new 11.5-acre mental health center located in a medically underserved low-income community with a poverty rate of 37.3 percent. The mental health care provider serves the needs of adults living with severe mental illness and children living with severe emotional disturbances. Upon completion of the project, 230 jobs were retained, and 50 jobs were created.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. A total of 1,502 loans were funded totaling nearly \$203.6 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	165	26,701
FHA	606	65,886
Home Affordable Refinance Program (HARP)	279	31,987
Veteran's Administration (VA)	286	47,258
Small Business Administration (SBA)	52	17,687
U.S. Department of Agriculture (USDA)	114	14,094

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AA was factored into the state's overall Low Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AA receiving full-scope review. Based on a limited-scope review, the bank's performance under the Lending Test in the Tulsa MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

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

INVESTMENT TEST

The bank's performance under the Investment Test in Oklahoma is rated High Satisfactory. Statewide investments totaling 29.0 percent enhanced the bank's overall performance.

Conclusions for Area Receiving a Full-scope Review

Based on a full-scope review, the bank's performance in the Oklahoma City MSA is adequate.

The bank has an adequate level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The current and prior period of qualified investments represents 3.9 percent of tier 1 capital allocated to the AA. A significant majority or 94 percent of total qualified investments are from the current period.

The bank exhibits good responsiveness to credit and community economic development needs identified in the AA, including affordable housing, community services, and revitalization/stabilization for low- and moderate-income individuals and geographies. Sixty-two percent of the bank's CD investments focused on affordable housing and 37.8 percent focused on community services, identified credit needs in the AA. Additionally, the bank provided 19 grants totaling \$698,000 to a variety of organizations that primarily supported community service needs.

The bank rarely uses innovative and/or complex investments to support CD initiatives in this AA. The bank made two current period investments consisting of NMTC projects that also serve to encourage future growth and improvement in the area. No prior period qualified investments are complex.

Examples of CD investments in the AA include:

- The bank originated a \$4.0 million LIHTC equity investment in support of a CD project that provided 160 affordable rental units to low- and moderate-income individuals and families in the AA. This investment was part of a \$211.9 million LIHTC affordable housing fund.
- The bank invested \$4.3 million in a LIHTC project that provided 57 affordable housing units to low- and moderate-income individuals and families in the AA.

Qualified Investments -State of Oklahoma										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Oklahoma City MSA	8	847	24	16,864	32	29.1	17,712	46.6	0	0
Limited Review:										
Tulsa MSA	2	25	27	9,360	29	26.4	9,385	24.7	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	26	9,620	26	23.6	9,620	25.3	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	22	1,238	1	20	23	20.9	1,258	3.3	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.

Statewide Investments in the State of Oklahoma

There are 49 current and prior period investments and grants with and without a purpose, mandate, or function to serve AAs in the broader statewide area. Eighty-nine percent support affordable housing and ten percent support community services while the remaining support revitalization/stabilization. These statewide investments totaling 29 percent further enhanced the bank's overall performance under the Investment Test in the state of Oklahoma.

Conclusions for Area Receiving a Limited-Scope Review

Performance in the limited-scope AA was factored into the state's overall High Satisfactory Investment Test rating and had a positive impact on the overall Investment Test rating for the state. Based on a limited-scope review, the bank's performance under the Investment Test in the Tulsa MSA is stronger than the bank's overall performance under the Investment Test in the full-scope area. This is due to a higher volume of CD investments.

SERVICE TEST

The bank's performance under the Service Test in state of Oklahoma is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, including the data in the tables below, the bank's performance in the Oklahoma City MSA is excellent.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively well below and exceeds the percentage of the population. The bank had no branches in low-income geographies and five branches in moderate-income geographies. Examiners gave slightly more weight to the bank's performance in moderate-income geographies as they contain three times the population as low-income geographies. The distribution was augmented by five MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Oklahoma City MSA	83.0	18	66.7	0	27.8	27.8	38.9	7.0	25.2	37.7	29.9

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 52 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 30.7 percent over the prior rating period to 1 (1.9 percent) deposit-taking ATMs in low-income geographies and 16 (30.8 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Oklahoma City MSA	1	4	0	-2	-1	0

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in the low-income geographies and closed two branches in moderate-income geographies. Branch closures were due to location issues, reduced customer usage, and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Thursday from 9:00 am to 5:00 pm, Friday from 9:00 am to 6:00 pm, and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 308 qualified CD service activities to ten organizations since the last evaluation, logging a total of 775 hours. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's CD services were responsive to the community needs in the AA, particularly homeownership education. The following is an example of CD services provided:

- Bank employees provided 37 first-time homebuyer seminars serving 266 low- and moderate-income individuals through a partnership with an affordable housing organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and positively affected the initial overall conclusions based on the AA receiving a full-scope review. Based on a limited-scope review, the bank's performance under the Service Test in the Tulsa MSA is excellent and consistent with the bank's performance under the Service Test in the full-scope area.

State Rating

State of Oregon

CRA rating for the State of Oregon²⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- An excellent geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in making CD loans, which positively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified investments that demonstrated excellent responsiveness to credit and community economic development needs lowered by weaker performance in the limited-scope AAs.
- The occasional use of innovative and/or complex investments.
- Retail service delivery systems that are readily accessible to geographies and individuals of different income levels.
- A significant level of CD services that are responsive to AA needs.

Description of Institution's Operations in Oregon

The state of Oregon is Chase's 24th largest rating area based on its total deposits of \$1.9 billion, representing 0.1 percent of the bank's total deposits. As of December 31, 2019, the bank operated 46 branches and 44 deposit-taking ATMs within the rating area, representing 0.9 percent of total branches and 0.2 percent of total ATMs. These totals exclude the branch and ATMs in Portland-Vancouver-Salem, Oregon-Washington CSA. The bank originated and purchased approximately \$2.0 billion in loans or 0.3 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, the bank-maintained \$7.7 billion in deposits in the state of Oregon, ranking 5th with 9.6 percent deposit market share. Banking competition consists of 43 institutions operating 944 offices in the state. U.S. Bank, N.A. was 1st in deposit market share with 20.5 percent; followed by Wells Fargo Bank, N.A. with 15.2 percent; and Bank of America with 13.2 percent.

The bank has delineated four AAs in the state of Oregon. The Medford-Grants Pass CSA (Medford CSA) accounts for 39.4 percent of the bank's deposits in the state of Oregon and received a full-scope review. The Bend-Redmond-Prineville CSA, Eugene-Springfield MSA, and the Oregon Non-Metro AA received a limited-scope reviews. The delineated AAs are described in appendix A.

Description of Full-Scope AA

The Medford CSA consists of the Medford MSA and the Grants Pass MSA. The bank defines its AA as the entire Medford-Grants Pass CSA. According to FDIC Deposit Market Share Data, as of June 30,

²⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

2019, the bank-maintained \$754.0 million in deposits in the AA, ranking 2nd in deposit market share with 14.8 percent.

The following table provides a summary of the demographics that includes housing and business information for the Medford CSA. Table A indicates that the percentage of low-income geographies is very low (1.8 percent), that the of volume of OOU's is very small in low-income census tracts (0.7 percent), however over 20.6 percent of families in the AA are low-income. The Medford CSA's cost of housing limits access to affordable homeownership among LMI borrowers. The median housing value in the Medford CSA is 3.3 times the averaged median income (\$49,947), 5.5 times the moderate-income, and 8.8 times the low-income, indicating a large proportion of OOU's are unaffordable to most low-income and many moderate-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Medford CSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$24,974 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$67,807 mortgage with a payment of \$749 per month; a moderate-income borrower earning \$39,958 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$139,250 mortgage with a payment of \$1,199 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 366 Medford-Grants Pass OR CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	1.8	17.5	57.9	22.8	0.0
Population by Geography	291,772	0.7	15.5	59.5	24.3	0.0
Housing Units by Geography	129,810	0.7	15.4	59.5	24.4	0.0
Owner-Occupied Units by Geography	74,665	0.1	10.6	61.2	28.1	0.0
Occupied Rental Units by Geography	43,349	1.7	23.1	57.0	18.1	0.0
Vacant Units by Geography	11,796	0.6	17.9	57.1	24.4	0.0
Businesses by Geography	29,770	4.1	16.6	56.0	23.3	0.0
Farms by Geography	1,577	1.2	8.6	66.7	23.5	0.0
Family Distribution by Income Level	75,464	20.6	18.5	19.6	41.2	0.0
Household Distribution by Income Level	118,014	23.7	16.4	17.9	42.0	0.0
Median Family Income MSA - 24420 Grants Pass, OR MSA		\$46,452	Median Housing Value			\$221,933
Median Family Income MSA - 32780 Medford, OR MSA		\$53,441	Median Gross Rent			\$886
			Families Below Poverty Level			13.7%

Source: 2015 ACS and 2019 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.

Economic Data

According to Moody's Analytics November 2019 Report, the Medford area has strong and improving migration trends; solid labor force growth; relatively low business costs; and a high share of jobs in new companies. However, the area has few high-tech jobs; low incomes; heavy exposure to cyclical retail and manufacturing; exposure to weak agriculture sector; and is distant from major airports and seaports. Leisure/hospitality, retail and construction have all shed jobs and healthcare growth has slowed considerably. On the bright side, a flatlining labor force and the lowest unemployment rate in recorded history are boosting average hourly earnings. Tourism is an important part of the area economy as the area has an array of wineries, outdoor activities, and an annual Shakespeare festival, which draws more than 100,000 visitors every year. The area's large and fast-growing population, particularly the population of seniors, will ensure that healthcare leads near-term job creation. Major employment industries in the area include education and health services; leisure and hospitality; and retail trade. Major employers include Asante Health System; Lithla Motors; Harry & David Operations Corp; and Rogue Valley Medical Center. Almost 1 in 4 residents in the area is age 65 or older and the cohort is expanding briskly. Unlike in most areas with a senior-heavy population, Medford's working-age cohort is growing several times faster than the U.S. average, and educational attainment is only slightly below average, which bodes well for labor supply. Relatively strong multifamily construction has propelled growth in residential starts in 2019, compensating for some of the weakness in the single-family market.

Within the Grants Pass portion of the AA, Moody's Analytics July 2019 Report indicates that the late-cycle expansion has cooled. The metro area has been unable to bounce back from a slowdown that took hold at the end of 2018 due in large part to a tight labor market. At 5 percent, the unemployment rate is down at least 1 percentage point from the lows reached at the height of its few expansions. Job creation has slowed along with labor force growth, and payroll employment is rising a touch more slowly. Despite business costs that are among the nation's lowest and favorable migration patterns; the area has an aging population; low labor force participation; above-average employment volatility; and a large retiree population past peak expenditure years. Manufacturing is holding up reasonably well, but downstream industries such as wholesale trade employ fewer workers than at any time since the early 2000s. A large and fast-growing population of seniors will ensure that healthcare and social assistance play an outsize role in the area's economy in the years to come. Although the area has not experienced as much of a spurt in population growth as in the rest of Oregon, the metro area is adding residents faster than the nation. Also, with a median age of just less than 48 years, Grants Pass has the 16th oldest population in the nation. One in three residents are over the age of 60, more than 50 percent higher than the U.S. average. Major employment industries in the area include education and health services; retail trade; and leisure and hospitality. Major employers in the area include Three Rivers Community Hospital; Rogue Community College; Master Brand Cabinet Co.; and Walmart. The area's housing market also has slowed considerably with sales and starts edging lower over the past two years. Single-family price appreciation has slowed significantly. Multifamily building, however, is a key area of strength.

Community Contacts

Three community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on economic development and community services. In addition to completed community contacts, a community needs assessment completed for the area by a consortium of nonprofit organizations was also reviewed. Contacts noted that Jackson and Josephine counties lag the larger metropolitan areas (Eugene, Salem, and Portland), but are ahead of the more rural areas. Medford especially continues to

see steady population growth. There is a housing shortage in both counties. Identified community needs include:

- Affordable Housing
- Living wage employment
- Higher educational attainment
- Nutrition and healthcare assistance
- Community outreach to educate low-income residents on available services
- Access to capital for new/developing small businesses
- Supportive services for seniors and individuals with disabilities
- Mental health care services
- Substance abuse counseling
- Access to a more efficient transportation system for rural residents without a vehicle
- Bi-lingual outreach to increase opportunity to those in limited English-speaking households

Scope of Evaluation in Oregon

The rating for the state of Oregon is based on an evaluation of the bank's performance in all AAs as listed in appendix A. The Medford CSA accounts for 39.4 percent of the bank's deposits in the state of Oregon and received a full-scope review. The remaining three AAs in the state of Oregon received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

The bank's performance under the Lending Test in the state of Oregon is rated Outstanding.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Medford CSA is excellent. Overall excellent lending levels, excellent geographic distribution of loans, and a high level of CD lending offset weaker but good borrower distribution. Product innovation/flexibility was also considered favorably when determining the rating.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight

in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 29.8 percent and 67.8 percent of the loan volume in the state by number and 86.4 and 10.2 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 2.2 percent of the loan volume in the state by number and 0.03 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Medford-Grants Pass CSA	1,610	4,259	152	4	6,025	28.1	39.4
Bend-Redmond-Prineville MSA	1,840	3,825	68	0	5,733	26.8	21.9
Eugene-Springfield MSA	1,655	4,224	92	12	5,983	27.9	20.4
OR Non-Metro AA	1,295	2,222	161	8	3,686	17.2	18.3
Total	6,400	14,530	473	24	21,427	100.0	100.0

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

Dollar Volume of Loans* ('000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
Medford-Grants Pass CSA	362,115	61,084	1,703	16,416	441,318	26.2	39.4
Bend-Redmond-Prineville MSA	576,579	55,429	680	0	632,688	37.6	21.9
Eugene-Springfield MSA	543,332	58,240	1,221	25,735	628,528	33.3	20.4
OR Non-Metro AA	241,836	28,611	1,920	18,362	290,729	2.9	18.3
Total	1,723,862	203,364	5,524	60,513	1,993,263	100.0	100.0

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

Chase ranked second in deposits out of 12 institutions with 13.6 percent market share.

In overall home mortgage lending, Chase ranked ninth out of 303 lenders with a 2.9 percent market share. Other lenders in the market include Rogue (8.7 percent), Guild Mortgage Co. (7.3 percent), and UMPQUA Bank (6.6 percent).

In small loans to businesses, Chase ranked first out of 72 lenders with 15.9 percent market share. Other major lenders are U.S. Bank, N.A. (13.8 percent), Citibank, N.A. (12.6 percent), and American Express National Bank (11.6 percent).

In small loans to farms, Chase ranked second out of 12 lenders with a 24.0 percent market share. The other major lenders and respective market shares are U.S. Bank, N.A. (33.5), Wells Fargo Bank, N.A. (11.7 percent), and Washington Federal (9.5 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 Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Examiners considered the limited proportion of low-income geographies and low proportion of housing units in low-income geographies, particularly OOUs (0.1 percent), which constrained lending opportunities. Greater significance was placed on performance in moderate-income geographies.
- The high level of competition in the AA was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the bank made no loans in low-income geographies. In moderate-income areas the proportion of loans exceeded both the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, the bank made no loans in low-income geographies. In moderate-income areas the proportion of loans was near to the percentage of owner-occupied units and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Examiners considered the small proportion of businesses in low-income geographies (4.1 percent) and competition between 72 lenders constrained lending opportunities to existing businesses.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in both low- and moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in both low- and moderate-income geographies was below the proportion of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Oregon 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is poor. The following information was taken into consideration when determining this rating.

- Examiners considered the limited number of farms in low-income geographies, (1.2 percent) and the fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the proportions of loans to small farms in low-income geographies was excellent and below the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.
- During 2014 to 2016, the bank made no loans to small farms in low-or-moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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, given the product lines offered by the institution.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and near to the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Oregon 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is adequate. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and below the aggregate distribution.

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.

The bank made four CD loans in its AA for a total of \$16.4 million, which represents 16.9 percent of the tier 1 capital allocated to the AA.

Examples of CD loans in the AA include:

- In January 2014, the bank made a loan for \$177,000 to provide 50 units of affordable housing to low- and moderate-income borrowers as identified by the National Low-Income Housing Coalition.
- In November 2014, the bank made a \$6.1 million loan to re-open the only operating sawmill in the county which provides jobs to 64 people. The mill is located in a middle-income census tract in a community that is classified as highly distressed due to its poverty rate of 31.7 percent and an unemployment rate of 15.6 percent.
- In May 2015, the bank made a \$5.3 million loan to enhance educational opportunities to low- and moderate-income students.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. A total of 390 loans were funded totaling nearly \$71.9 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	32	5,915
FHA	34	6,058
HARP	107	15,232
VA	55	12,760
SBA	12	5,768
USDA	150	26,143

Conclusions for areas Receiving a Limited-Scope Review

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Eugene-Springfield MSA and the OR Non-Metro AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the Bend-Redmond-Prineville CSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance is primarily due to the lack of CD lending.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Oregon is rated High Satisfactory. An excellent level of qualified investments that demonstrated excellent responsiveness to credit and community economic development needs was lowered by weaker performance in the limited-scope AAs.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 19.4 percent of tier 1 capital allocated to the AA. A significant majority or 99.6 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA, including supporting affordable housing and community services for LMI individuals, and revitalization/stabilization. Fifty-three percent of the bank's CD investments focus on affordable housing, while 47.1 percent focus on revitalizations/stabilizations and consisted of two NMTC serving as catalysts for future growth and development. Both are identified credit needs in the AA. The bank did not give any grants within the current period. Three prior period CD investments address affordable housing through LIHTC transactions.

The bank makes occasional use of innovative and/or complex investments to support CD initiatives in this AA. Complex investments represent 47.0 percent of total investments in the AA. These investments consist of NMTCs and serve as catalysts for future growth and other improvements.

Examples of community development investments in the AA include:

- The bank invested \$1.5 million in a LIHTC project, which contributed to the creation of 207 affordable housing units for low- and moderate-income individuals and families in the AA.
- The bank originated a \$5.1 million NMTC investment for the redevelopment of a 92-year-old Southern Oregon lumberyard owned by a small neighborhood business. This investment allowed the business to reopen and upgrade its Small Log Mill (SLM). The upgrade and restart of the SLM brought back 64 employees out of the 85 that were laid off in 2013, spurring much needed economic stimulus throughout the region, and re-established the only operating sawmill in the county. This area lies within a moderate-income community, defined by high economic distress (poverty rate of 31.67 percent and an unemployment rate of 15.6 percent) due to the downturn of the historical timber resource-based economy.

Qualified Investments -State of Oregon										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Medford-Grants Pass CSA	3	67	6	18,753	9	15.0	18,820	28.4	0	0
Limited Review:										
Bend-Redmond-Prineville CSA	4	783	0	0	4	6.8	783	1.2	0	0
Eugene-Springfield MSA	9	1,370	4	33,893	13	21.6	35,263	53.1	0	0
OR Non- Metro AA	10	2,284	4	6,377	14	23.3	8,661	13.0	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	17	1,895	17	28.3	1,895	2.9	0	0

Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	3	915	0	0	3	5.0	915	1.4	0	0
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* 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.

Statewide Investment in the State of Oregon

The bank has qualified investments throughout the state of Oregon whose P/M/F include serving the AAs. They consist of LIHTC investments and many grants to organizations responding to the need for providing financial education, financial management and credit building skills to low- and moderate-income individuals and families. Investments with no P/M/F to serve AAs consist of three LIHTC investments that helped create 108 low- and moderate-income housing units. Investments with and without a P/M/F to serve AAs represent 4.3 percent of total state qualified investments. The investments all address an identified community development need. These investment in the broader statewide area further support the bank's overall good performance under the Investment Test in state of Oregon.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating which did significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Eugene-Springfield MSA and the OR Non-Metro AA is consistent with bank's overall excellent performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the Bend-Redmond-Prineville CSA is weaker than the bank's overall excellent performance under the Investment Test in the full-scope area due to a lower volume of CD investments.

SERVICE TEST

The bank's performance under the Service Test in state of Oregon is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, including the data in the tables below, the bank's performance in the Medford CSA is excellent.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution exceeds the population. The bank had one branch in a low-income geography and three branches in moderate-income geographies.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Medford-Grants Pass CSA	39.4	11	36.7	9.1	27.3	54.5	9.1	0.7	15.5	59.5	24.3

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 17 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 60.0 percent over the prior rating period to two (11.8 percent) deposit-taking ATMs in low-income geographies and six (35.3 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

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

The bank's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low- and moderate-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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank provided a significant level of CD services that are responsive to AA needs.

Bank records show that employees provided technical assistance and/or job-specific expertise for 31 CD service activities to 3 organizations for a total of 100 qualified hours of service within the AA. A majority of the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The activities were responsive to AA needs, particularly affordable housing, and financial literacy. The following are examples of CD services provided in the AA:

- The bank provided financial incentives to 76 low- and moderate-income homebuyers to take homebuyer education from third-party organizations.
- A bank employee provided financial literacy training to low- and moderate-income participants of a national nonprofit. The purpose of this training was to equip nonprofit staff with tools and resources to make them more effective. The bank provided innovative trainings on topics such as financial education for the senior population focused on the rising issues of financial fraud and abuse and trainings on innovative financial tools and resources.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Bend-Prineville MSA and OR Non-Metro AA is consistent with the bank's overall excellent performance under the Service Test in the full-scope area. The bank's performance under the Service Test in the Eugene-Springfield MSA is weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Texas

CRA rating for the State of Texas ²⁶: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent level of lending activity.
- Adequate geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- A poor level of CD loans, which negatively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- A good level of investments that displayed excellent responsiveness to credit and community economic development needs.
- The significant use of innovative and/or complex qualified investments.
- Broader statewide investments, which positively affected the rating.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels.
- A significant level of CD services that were responsive to AA needs.

Description of Institution's Operations in Texas

The state of Texas is Chase's second largest rating area based on aggregate deposits of \$191.9 billion representing 18.3 percent of the bank's total deposits. As of December 31, 2019, the bank operated 541 branches and 1,777 deposit-taking ATMs within the rating area, representing 10.9 percent of total branches and 24.2 percent of total ATMs. The bank originated and purchased approximately \$61.7 billion in loans or 8.8 percent of total bank loan originations and purchases during the evaluation period in the state

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 510 banks operating 6,399 branches in the state. Chase ranked first in deposit market share with 21.9 percent. Major competitors in the state based on deposit market share include Bank of America, N.A. (14.7 percent), USAA Federal Savings (8.7 percent), and Wells Fargo Bank, N.A. (8.1 percent).

Chase delineated 21 AAs in the state of Texas. Refer to appendix A for a complete description of the AAs. The Austin-Round Rock-Georgetown, TX MSA (Austin MSA), Dallas-Fort Worth, TX CSA (Dallas CSA), and Houston-The Woodlands-Sugar Land, TX MSA (Houston MSA), which combined account for 96.2 percent of the deposits and 82.9 percent of lending in the state, received full-scope reviews. The Abilene MSA, Amarillo MSA, Beaumont-Port Arthur MSA, Brownsville-Harlingen MSA, College Station-Bryan MSA, El Paso MSA, Killeen-Temple MSA, Laredo MSA, Longview MSA, Lubbock MSA, McAllen-Edinburg-Mission MSA, Midland-Odessa CSA, San Antonio-New

²⁶ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Braunfels MSA, Tyler MSA, Waco MSA, Wichita Falls MSA, and Texas Non-MSA received limited-scope reviews. Refer to appendix A for a complete description of each AA.

Description of Full-Scope AAs

Austin MSA

According to FDIC Deposit Market Share Data as of June 30, 2019, the bank-maintained deposits of \$110 billion in the area, ranking it 1st in deposit market share with 44.1 percent. Banking competition consists of 95 financial institutions operating 1,416 offices in the AA. Major banking competitors include Wells Fargo Bank, N.A. with 9.8 percent market share; Bank of America, N.A. with 9.5 percent market share; and BBVA USA with 5.69 percent market share. As of December 31, 2019, the bank operated 186 branches and 681 deposit-taking ATMs in the AA, representing 3.7 percent of total bank branches and 4.1 percent of total bank ATMs.

The following table provides a summary of the demographics that includes housing and business information for the Austin MSA. Table A indicates that the volume of OOUs is small in low-income census tracts (3.8 percent) and over 22.5 percent of families in the AA are low-income with 9.5 percent below the poverty level. The Austin MSA cost of housing also limits access to affordable homeownership, particularly among low-income borrowers. The median housing value in the Austin MSA (\$233,705) is approximately three times the MSA's median income, almost four times moderate-income, and up to six times low-income, indicating a limited proportion of OOUs are affordable to low-income borrowers. 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.

In the Austin MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,499 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$115,663 mortgage loan with a payment of \$1,185 per month; a moderate-income borrower earning \$63,198 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$257,781 mortgage loan with a payment of \$1,896, per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	350	10.6	22.3	36.6	28.9	1.7
Population by Geography	1,889,094	10.1	22.3	37.3	29.2	1.1
Housing Units by Geography	747,159	10.1	20.6	38.2	30.1	0.9
Owner-Occupied Units by Geography	399,483	3.8	18.1	40.3	37.6	0.2
Occupied Rental Units by Geography	289,795	18.4	23.8	35.5	20.5	1.7
Vacant Units by Geography	57,881	12.0	22.1	37.9	26.6	1.5
Businesses by Geography	204,774	6.7	14.0	33.9	44.2	1.2

Farms by Geography	4,339	4.7	17.8	40.2	37.0	0.3
Family Distribution by Income Level	428,451	22.5	16.9	19.8	40.8	0.0
Household Distribution by Income Level	689,278	23.6	16.6	18.0	41.7	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$233,705
			Median Gross Rent			\$1,067
			Families Below Poverty Level			9.5%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics January 2020 report, the Austin-Round Rock-Georgetown area is advancing steadily, with job growth about a percentage point faster than the national average on a year-over-year basis. High tech is the primary driver of growth. In November, Apple announced that it had broken ground on its new campus. The development of the 133-acre site will cost \$1 billion, employing hundreds of construction workers. Completion is expected in 2022, and the facility could house up to 9,000 additional employees. This would potentially bring the local employee total to 15,000, making the company the largest private employer in the metro area. Other technology focused companies have also been expanding in the area, including Google, Dell, Facebook, and Oracle. The area has strong population growth and a well-educated labor force. Major employment industries include professional and business services; leisure and hospitality; and education and health services. Major employers in the area include University of Texas-Austin; Dell; and Seton Healthcare Network.

Moody's indicates that home sales rose nearly 20 percent in 2019, defying previous expectations of a slowdown. Further, house prices increased 4.7 percent, faster than the national average. These results have stimulated development and as a result, new permits for both single- and multifamily are nearly back to their previous peaks. The strong labor market and in-migration of professionals taking high paying jobs in IT will keep housing demand strong.

Community Contacts

Three community contacts completed during the examination period with organizations serving the area were reviewed to ascertain credit and community development needs. Contacts were completed with organizations focused on affordable housing; services for low-income individuals; and community revitalization. Contacts noted that the Austin area economy is booming. The area, which had previously been known as a "music capital" has seen an influx of high-tech businesses, which has brought a lot of wealth to the area. Contacts noted that land values in Austin are high, which makes it more challenging to develop affordable housing. Community needs identified include:

- Affordable housing for low- and moderate-income individuals and households
- Financial education for the unbanked and underbanked
- Program related investments to help non-profit developers create affordable housing

Dallas CSA

According to FDIC Deposit Market Share Data as of June 30, 2019, the bank-maintained deposits of \$110 billion in the area, ranking it 1st in deposit market share with 44.1 percent. Banking competition consists of 95 financial institutions operating 1,416 offices in the AA. Major banking competitors include Wells Fargo Bank, N.A. with 9.8 percent market share; Bank of America, N.A. with 9.5 percent market share; and BBVA USA with 5.69 percent market share. As of December 31, 2019, the bank operated 186 branches and 681 deposit-taking ATMs in the AA, representing 3.7 percent of total bank branches and 4.1 percent of total bank ATMs.

Table A below provides a summary of the demographics that includes housing and business information for the Dallas CSA. The table indicates that the volume of OOUs is small in low-income census tracts (5.0 percent) and over 23.3 percent of families in the AA are low-income with 11.4 percent below the poverty level. The Dallas CSA cost of housing also limits access to affordable homeownership, particularly among low-income borrowers. The median housing value in the Dallas CSA (\$174,539) ranges from two to three times the CSA's median income, almost four times moderate-income, and up to almost six times low-income, indicating a limited proportion of OOUs are affordable to low-income borrowers. 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.

In the Dallas CSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$30,437 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$79,609 mortgage loan with a payment of \$913 per month; a moderate-income borrower earning \$48,698 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$152,194 mortgage loan with a payment of \$1,461 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,327	12.7	25.8	28.7	32.3	0.5
Population by Geography	6,833,178	10.7	24.9	30.4	33.8	0.1
Housing Units by Geography	2,614,182	11.1	23.9	31.0	33.8	0.2
Owner-Occupied Units by Geography	1,444,988	5.0	19.3	32.3	43.3	0.1
Occupied Rental Units by Geography	964,171	18.6	29.9	29.5	21.7	0.3
Vacant Units by Geography	205,023	19.0	27.8	29.0	23.9	0.3
Businesses by Geography	675,727	6.8	18.6	27.6	46.4	0.6
Farms by Geography	12,925	4.7	16.5	33.5	45.0	0.4
Family Distribution by Income Level	1,670,898	23.3	16.5	18.2	41.9	0.0
Household Distribution by Income Level	2,409,159	23.9	16.5	17.7	41.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$174,539

Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX	\$69,339	Median Gross Rent	\$976
Median Family Income MSA - 43300 Sherman-Denison, TX MSA	\$60,873	Families Below Poverty Level	11.4%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to Moody's Analytics February 2020 report, the Dallas-Plano-Irving area is one of the largest metro areas in the country and has been the best performing in terms of job gains over the past year. The pace of job gains has tripled the national average. Core professional services, financial services, and construction are leading job gains with construction up at a double-digit rate in 2019. These are especially well-paying industries, and consequently growth in the number of high-wage jobs has also been triple the U.S. rate. The unemployment rate has declined to a 20-year low 3.1 percent, even as the labor force has risen strongly. Over the past year, payrolls in professional services have risen 5.5 percent. The source of many of the new entrants in the labor force has been in-migration of workers taking new jobs amid corporate expansions and relocations. Major employers in the area include Walmart; AT & T; Baylor Scott & White Health; and Bank of America, N.A. In the housing market, new construction has rebounded since mid-2019. Past above-average home price increases have reduced affordability in the single-family housing market; however, recent price increases have been no faster than the national average.

The Fort Worth-Arlington area has a lower cost of doing business and more housing affordability compared to Dallas. According to Moody's Analytics February 2020 report, the Fort Worth-Arlington area is advancing at a pace slightly above the national average in terms of job growth. The performance of each major industry approximately matches its national counterpart with a few exceptions. Specifically, financial services have grown at twice the national rate over the past year, but well-paying professional services have been declining since mid-2018. As a result, growth rates of both high-wage jobs and average hourly earnings have been below the national average. The unemployment rate has remained a very low 3.2 percent and labor force growth has been above average. Major employers include American Airlines; Lockheed Martin; and Texas Health Resources. Housing market indicators are improving. In late 2018 and the first part of 2019, new permits for single-family homes declined about 20 percent, but they have since rebounded by 15 percent. Apartment building is rebounding as well.

Community Contacts

Three community contacts completed during the examination period with organizations serving the area were reviewed to ascertain credit and community development needs. Contacts were completed with organizations focused on affordable housing; services and programs for low-income individuals; and economic development. Contacts noted that the area economy is good with stable job growth and low unemployment. Because the economy is doing so well affordable housing access is becoming more of an issue. There are some parts of the area where low-income residents struggle with lack of food access (food deserts); are unbanked or underbanked; and do not have access to reliable transportation allowing them to access better paying jobs. Contacts identified several needs in the area including:

- Access to affordable housing, including single-family dwellings for purchase and affordable rental housing
- Support for workforce development and job training programs
- Financial education and self-sufficiency training

Houston MSA

According to FDIC Deposit Market Share Data as of June 30, 2019, the bank-maintained deposits of \$110 billion in the area, ranking it 1st in deposit market share with 44.1 percent. Banking competition consists of 95 financial institutions operating 1,416 offices in the AA. Major banking competitors include Wells Fargo, Bank, N.A. with 9.8 percent market share; Bank of America, N.A. with 9.5 percent market share; and BBVA USA with 5.69 percent market share. As of December 31, 2019, the bank operated 186 branches and 681 deposit-taking ATMs in the AA, representing 3.7 percent of total bank branches and 4.1 percent of total bank ATMs.

Table A below provides a summary of the demographics that includes housing and business information for the Houston MSA. The table indicates that the volume of OOUs is small in low-income census tracts (5.2 percent) and over 24.4 percent of families in the AA are low-income with 12.8 percent below the poverty level. The Houston MSA cost of housing also limits access to affordable homeownership, particularly among low-income borrowers. The median housing value in the Houston MSA (\$172,974) is approximately 2.5 times the MSA's median income, over three times moderate-income, and up to five times low-income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Houston MSA, assuming a 30-year mortgage with a five percent interest rate and three percent down payment, while not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,686 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$114,139 mortgage loan with a payment of \$1,041 per month; a moderate-income borrower earning \$55,498 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$213,325 mortgage loan with a payment of \$1,665 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for some low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 288 Houston-The Woodlands TX MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,072	14.8	29.0	25.6	29.5	1.1
Population by Geography	6,346,653	11.6	25.9	27.9	34.2	0.4
Housing Units by Geography	2,402,507	12.2	25.3	27.2	35.1	0.3
Owner-Occupied Units by Geography	1,314,631	5.2	21.3	29.4	44.1	0.1
Occupied Rental Units by Geography	854,011	20.9	30.2	24.6	23.7	0.6
Vacant Units by Geography	233,865	19.5	29.6	24.0	26.6	0.3
Businesses by Geography	559,917	9.4	18.4	23.4	48.6	0.2

Farms by Geography	9,029	5.2	16.6	31.1	47.0	0.1
Family Distribution by Income Level	1,530,226	24.4	16.1	17.1	42.4	0.0
Household Distribution by Income Level	2,168,642	24.9	15.9	16.8	42.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$172,974
			Median Gross Rent			\$972
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics February 2020 Report, the Houston MSA advanced twice as fast as the national average in terms of job growth over the past year. All major industries outperformed their national counterparts, with professional services, construction and distribution leading the way. Because these are well-paying industries, growth in high-wage jobs was twice the national average. However, manufacturing has been weak in recent months, with the local Purchasing Manager's Index signaling contraction in November and December. The area is a leader in oil and gas technologies which supports technical and professional service jobs in these industries. The area also has significant trade and export links given its location along the Texas Gulf Coast. The unemployment rate has begun to rise a bit over the past several months from a low of 3.4 percent in September to 3.7 percent in December. However, the labor force is still growing. Major employment sectors in the area include professional and business services, education and health services and government. Major employers include Memorial Hermann Health System; The University of Texas Health Science Center; and Schlumberger LTD (an oil services company). Housing indicators are improving, and above-average population growth is anticipated.

Community Contacts

Five community contacts completed during the examination period with organizations and entities serving the community were reviewed to ascertain community credit needs. The organizations contacted focus on activities such as affordable housing, small business assistance and funding, community services, and community and economic development. Contacts noted that the area had been significantly impacted by recent natural disasters such as Hurricanes Irma and Harvey in 2017 and that recovery from these disasters has been more problematic for minority households in the area's low-income neighborhoods. The potential for people to be victimized by predatory lenders and non-licensed or unqualified contractors is higher due to the demand for rebuilding, cost of rebuilding, and payment ability. Those on limited incomes are less prepared than those with disposable incomes or savings. Financial education is needed, along with small dollar loans to assist low-income residents. Other needs identified by the contacts include:

- Technical assistance for small businesses to help them be better prepared to deal with natural disasters
- Financing, including down payment assistance for low- and moderate-income borrowers to purchase homes
- Affordable rental housing for low- and very low-income households
- Funding support for area non-profits

- Foreclosure assistance
- Financing for small businesses, including micro-loans

Scope of Evaluation in Texas

Examiners applied the methodology described under the Ratings section at the front of this document. The Austin MSA, Dallas CSA and Houston MSA, Dallas CSA received full-scope reviews. The AAs combined account for 96.2 percent of the deposits and 82.9 percent of the lending in the state. The performance in the Houston MSA and Dallas CSA, received greater weight based on their volume of deposits and lending. The remaining AAs in the state of Texas received a limited-scope review. Performance in limited-scope AAs and its effect on the CRA rating is discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in the state of Texas is rated High Satisfactory.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 28.3 percent and 71.1 percent of the loan volume in the state by number and 81.4 and 15.3 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received the least weight in reaching conclusions; however, examiners also considered the importance of the bank's farm lending to the AA. Farm loans represented 0.5 percent of the loan volume in the state by number and 0.1 percent loan volume by dollar.

Conclusions for Areas Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Houston MSA, Dallas CSA and Austin MSA is good. The conclusion reflects overall excellent lending levels, good borrower distribution of loans, and adequate geographic distribution of loans. Product innovation and flexibility was considered favorably while the overall low level of CD lending was given negative consideration.

Lending Activity

Lending levels reflect an excellent responsiveness to the credit needs in the bank's AAs. Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Houston-The Woodlands-Sugar Land MSA	58,623	174,912	997	18	234,550	35.2	42.8
Dallas-Fort Worth CSA	72,915	155,651	1,008	29	229,603	34.5	50.4
Austin-Round Rock-Georgetown MSA	26,024	61,692	430	30	88,176	13.2	3.0
San Antonio-New Braunfels MSA	14,200	29,963	222	5	44,390	6.7	1.1
El Paso MSA	2,377	8,340	25	4	10,746	1.6	0.6
McAllen-Edinburg-Mission MSA	1,446	6,806	89	10	8,351	1.3	0.3
Beaumont-Port Arthur MSA	1,128	2,819	32	0	3,979	0.6	0.2
Brownsville-Harlingen MSA	870	2,910	47	1	3,828	0.6	0.2
Midland-Odessa CSA	1,998	5,632	62	1	7,693	1.2	0.3
Tyler MSA	836	2,328	43	0	3,207	0.5	0.1
College Station-Bryan MSA	1,420	3,101	37	0	4,558	0.7	0.2
Longview MSA	571	1,752	24	0	2,347	0.4	0.2
Wichita Falls MSA	382	1,111	14	2	1,509	0.2	0.1
Waco MSA	1,131	2,615	49	2	3,797	0.6	0.1
Amarillo MSA	565	2,978	115	0	3,658	0.5	0.1
Killeen-Temple MSA	1,260	2,346	39	3	3,648	0.5	0.1
Abilene MSA	535	936	12	2	1,485	0.2	0.1
Laredo MSA	572	2,151	17	1	2,741	0.4	0.1
Lubbock MSA	861	2,774	160	2	3,797	0.6	0.0
Texas Non-MSA Total (Brenham, Corsicana, Marshall, Levelland, and Fredericksburg)	1,114	3,022	179	2	4,317	0.7	0.3
Total	188,828	473,839	3601	112	666,380	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Houston-The Woodlands-Sugar Land MSA	15,602,086	3,420,452	13,334	106,380	19,142,252	31.0	42.8
Dallas-Fort Worth CSA	20,134,392	3,336,335	14,493	765,213	24,250,433	39.3	50.4
Austin-Round Rock-Georgetown MSA	8,482,615	1,135,305	5,011	737,070	10,360,001	16.8	3.0
San Antonio-New Braunfels MSA	3,055,501	510,218	4,310	34,649	3,604,678	5.8	1.1
El Paso MSA	323,268	191,095	344	71,346	586,053	0.9	0.6
McAllen-Edinburg-Mission MSA	200,628	162,510	966	104,178	486,282	0.8	0.3
Beaumont-Port Arthur MSA	177,991	60,918	233	0	239,142	0.4	0.2
Brownsville-Harlingen MSA	133,784	58,881	502	18,246	211,413	0.3	0.2
Midland-Odessa CSA	551,706	93,716	547	24,798	670,767	1.1	0.3
Tyler MSA	173,974	48,170	419	0	222,563	0.4	0.1
College Station-Bryan MSA	310,286	52,855	349	0	363,490	0.6	0.2
Longview MSA	85,047	47,744	251	0	133,042	0.2	0.2
Wichita Falls MSA	44,567	41,881	170	1,239	87,857	0.1	0.1
Waco MSA	189,963	50,169	407	13,509	254,048	0.4	0.1
Amarillo MSA	93,321	53,821	1,624	0	148,766	0.2	0.1
Killeen-Temple MSA	188,995	34,794	434	16,870	241,093	0.4	0.1
Abilene MSA	88,017	12,048	162	16,648	16,648	0.0	0.1
Laredo MSA	79,808	47,785	284	13,511	141,388	0.2	0.1
Lubbock MSA	161,846	34,192	1,551	14,115	211,704	0.3	0.0
Texas Non-MSA Total (Brenham, Corsicana, Marshall, Levelland, and Fredericksburg)	212,935	53,096	2,238	15,135	283,135	0.5	0.3
Total	50,290,730	9,445,985	47,629	1,952,907	61,737,251	100	100

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

Houston MSA

Chase dominated the deposit market and ranked first out of 95 institutions with 44.1 percent market share.

In overall home mortgage lending, Chase ranked second with 6.3 percent market share placing it in the top 1 percent of lenders. This is a highly competitive market with 1,011 mortgage lenders. No lender dominated the mortgage market. The other leading lenders and market share are Wells Fargo Bank, N.A. (8.5 percent), Quicken Loans (3.8 percent), and Bank of America, N.A. (3.7 percent).

In small loans to businesses, Chase ranked first with 22.6 percent market share out of 235 lenders. American Express National Bank was second in the market with 20.6 percent market share.

Chase ranked first in small loans to farms with 26.3 percent market share. There were 35 lenders in the MSA. Other major lenders and market share are Prosperity Bank (19.1), Wells Fargo Bank, N.A. (16.0 percent) and John Deere Financial, F.S.B. (9.3 percent).

Dallas CSA

Chase ranked second in deposits out of 164 institutions with 21.8 percent market share.

In overall home mortgage lending, Chase ranked second with 6.4 percent market share placing it in the top 1 percent of lenders. This is a highly competitive market with 1,101 mortgage lenders. No lender dominated the mortgage market. The other leading lenders and market share are Wells Fargo Bank, N.A. (9.6 percent), Bank of America, N.A. (3.8 percent), and Quicken Loans (3.3 percent).

In small loans to businesses, Chase ranked first with 20.2 percent market share out of 259 lenders. American Express National Bank was second in the market with 19 percent market share.

Chase ranked first in small loans to farms with 19.4 percent market share. There were 57 lenders in the MSA. Other major lenders and market share are Wells Fargo Bank, N.A. (15.1 percent) First Financial Bank, N.A. (7.7), and John Deere Financial, F.S.B. (7.7 percent).

Austin MSA

Chase ranked second in deposits out of 67 institutions with 17.9 percent market share.

In overall home mortgage lending, Chase ranked second with 5.1 percent market share placing it in the top 1 percent of lenders. This is a highly competitive market with 823 mortgage lenders. No lender dominated the mortgage market. The other leading lenders and market share are Wells Fargo Bank, N.A. (9.8 percent), University Federal Credit Union (3.1 percent), and Quicken Loans (2.6 percent).

In small loans to businesses, Chase ranked first with 25 percent market share out of 185 lenders. American Express National Bank was second in the market with 19.1 percent market share.

Chase ranked first in small loans to farms with 29.5 percent market share. There were 27 lenders in the MSA. Other major lenders and market share are BancorpSouth (16.6 percent), Wells Fargo Bank, N.A. (13.4 percent), and John Deere Financial, F.S.B. (9.91 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is adequate. The following information was taken into consideration when determining this rating.

Houston MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (5.2 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (1,011 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income geographies was well below the percentage of OOUs and respectively exceeded and was near to the aggregate distribution of loans by all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans in low- and moderate-income geographies was well below the percentage of OOUs and respectively near to and below the aggregate distribution of loans by all lenders.

Dallas CSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (5.0 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (1,011 home mortgage lenders) was also considered and examiners placed greater significance on performance when compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low- and moderate-income geographies was well below the percentage of OOUs and respectively was below and near to the aggregate distribution of loans by all lenders.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans in low- and moderate-income geographies was well below the percentage of OOUs and below the aggregate distribution of loans by all lenders.

Austin MSA

- The limited proportion of housing units in low-income geographies, particularly OOUs (3.8 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (823 home mortgage lenders) was also considered and examiners placed greater significance on performance when compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income geographies was near to the percentage of OOUs and the aggregate distribution of loans by all lenders. In moderate-income geographies, the proportion of loans was well below percentage of OOUs and below the aggregate distribution of loans by all lenders.

- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with the performance during the 2017 to 2019 period. The proportion of loans in low- and moderate-income geographies was below the percentage of OOU's and respectively near to and below the aggregate distribution of loans by all lenders.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this conclusion.

Houston MSA

- The smaller proportion of businesses in low-income geographies (9.4 percent) and competition between 235 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low- and moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was stronger. Performance in low- and moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.

Dallas CSA

- The smaller proportion of businesses in low-income geographies (6.8 percent) and competition between 259 lenders constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Between 2017 and 2019, the proportion of small loans to businesses in low- and moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was consistent with performance from 2017 to 2019. Performance in low- and moderate-income geographies was below the proportion of businesses and the aggregate distribution.

Austin MSA

- Between 2017 and 2019, the proportion of small loans to businesses in low- income geographies exceeded both the proportion of businesses and the aggregate distribution. The proportion of small loans to businesses in moderate- income geographies was below the proportion of businesses and near to the aggregate distribution.

- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was slightly weaker than the aggregate performance in moderate-income tracts during 2017 to 2019 and otherwise consistent. The proportion of small loans to businesses in low-income geographies exceeded both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Texas 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is adequate. The following information was taken into consideration when determining this rating.

Houston MSA

- The limited percentage of farms in low-income geographies (5.2 percent), level of competition in the AA (35 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies were well below the proportion of farms in those geographies and exceeded the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was generally consistent with performance during the 2017 to 2019 period. the proportion of loans to small farms in low-income geographies was below the proportion of farms in those geographies and exceeded the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution

Dallas CSA

- The limited percentage of farms in low-income geographies (4.7 percent), level of competition in the AA (57 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans to small farms in low- and moderate-income geographies was well below both the proportion of farms in those geographies and exceeded the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was stronger than performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies exceeded the proportion of farms in those geographies and the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was below the proportion of farms in those geographies and near to the aggregate distribution

Austin MSA

- The limited percentage of farms in low-income geographies (4.7 percent), level of competition in the AA (27 lenders) and the fact that farm lending is not a focus of the bank was considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans to small farms in low- income geographies were near to the proportion of farms in those geographies and exceeded the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms in those geographies and well below the aggregate distribution.
- Performance in low- and moderate-income geographies during the 2014 to 2016 period was weaker than performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and exceeded the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Houston MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was near to both the proportion of moderate-income families and the aggregate distribution.

- During 2014 to 2016 the bank's performance was similar to performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.

Dallas CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners considered housing affordability challenges, particularly for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was near to the proportion of moderate-income families and exceeded the aggregate distribution.
- During 2014 to 2016 the bank's performance was weaker than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.

Austin MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges, particularly for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016 the bank's performance was slightly stronger than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans was below both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Houston MSA

- Slightly greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Dallas CSA

- Slightly greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Austin MSA

- Slightly greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Texas 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

Houston MSA

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Dallas CSA

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Austin MSA

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank made a low level of CD loans which was considered negatively when determining the Lending Test rating for the state of Texas. The respective excellent and adequate levels of CD lending in Dallas and Austin was offset by poor to very poor levels in the larger Houston. MSA

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

Houston MSA

The bank has made few, if any, CD loans in the Houston-The Woodlands- Sugar Land, TX MSA. There were 18 CD loans made for a total of \$106.4 million. This represents 0.8 percent of the tier 1 capital allocated to the AA. Most of the CD loans were for community services, which is a critical need in this AA.

Examples of CD loans in the AA include:

- In July 2015, Chase originated a \$40 million loan to Houston Independent School District for a Tax-Exempt Direct Purchase Bond, used to refund existing Series 2005 Limited Tax Bonds, lower the overall debt service requirements of the district, and paid costs of issuing the bonds. According to the National Center for Education Statistics (NCES), 80 percent of the district student population is eligible for the Federal Free or Reduced Lunch program.
- In May 2019, Chase originated a \$32 million term loan to Goose Creek Consolidated Independent School District, located in Harris County, TX for a Series 2019 Maintenance Tax Note. The proceeds will be used to renovate and upgrade pipes, valves, insulation, turf, and exterior lighting in the District. According to the NCES, the majority of the student population is eligible for the Federal Free or Reduced Lunch program.

Dallas CSA

The bank has made an adequate level of CD lending in the Dallas-Fort Worth, TX-OK CSA. The bank originated eight CD loans totaling \$342.8 million. This represents 4.6 percent of the tier 1 capital allocated to the AA. Most of the CD loans were for community services which is a critical need in this AA.

Examples of CD loans in the AA include:

- The bank provided a \$322 million loan to Dallas Independent School District. Funds were used for the purposes of constructing, improving, renovating, and equipping school buildings of the District. Funds were also used to acquire real property, purchase school buses, construct and equip bus maintenance and operating facilities for the District, and refinancing, renewing, or refunding Notes and Loans. According to the NCES, 88 percent of the student population is eligible for the Federal Free or Reduced Lunch program.
- The bank's New Markets Tax Credit Group originated a \$11.7 million construction loan to finance the new construction of a 44,000 square foot medical care facility to primarily serve low-income residents in South Dallas.

Austin MSA

The bank is a leader in making CD loans in the Austin-Round Rock, TX MSA. The bank made 30 CD loans totaling \$737.1 million. This represents 74.5 percent of the tier 1 capital allocated to the AA. Most of the CD loans were for revitalization/stabilization, which is a critical need in this AA.

Examples of CD loans in the AA include:

- The bank originated a \$166.2 million construction loan to finance the acquisition and development of a 625,590 square foot retail property to be located in Austin, TX in a moderate-income census tract. The lifestyle center represents the retail component of a mixed-use project, which will provide

a wide variety of opportunities and enhancement to current and future residents of the moderate-income geography.

- The bank originated a \$70 million term loan to refinance the development of a 3-story office building located on the southeast side of Northwest Austin. The project will revitalize this commercial/industrial area into a mixed-use neighborhood

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Houston MSA

As shown in the table below, a total of 11,335 loans were funded totaling \$1.8 billion.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	2,173	433,622
FHA	4,805	618,392
USDA	718	106,923
VA	1,025	230,053
HARP	1,931	224,361
SBA	683	242,547

Dallas CSA

As shown in the table below, a total of 11,909 loans were funded totaling \$1.9 billion.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	2,447	493,101
FHA	4,429	553,006
USDA	1,161	172,234
VA	1,141	268,094
HARP	1,867	234,814
SBA	864	277,813

Austin MSA

As shown in the table below, a total of 4,001 loans were funded totaling \$835 million.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	1,192	320,899
FHA	841	122,761
USDA	914	144,006
VA	328	88,068
HARP	463	63,494
SBA	263	95,811

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Abilene MSA, Amarillo MSA, Brownsville-Harlingen MSA, El Paso MSA, Killeen-Temple MSA, Laredo MSA, McAllen-Edinburg-Mission MSA, Midland-Odessa CSA, San Antonio-New Braunfels MSA, Waco MSA, Wichita Falls MSA, and Texas Non-MSA is consistent with the bank's overall good performance under the Lending Test in the full-scope areas. The performance under the Lending Test in the Beaumont-Port Arthur MSA, College Station-Bryan MSA, Tyler MSA, Longview MSA, and Lubbock MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. Performance is weaker due to weaker proportional performance overall.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Texas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Houston MSA and the Dallas CSA is good and is excellent in the Austin MSA.

Houston MSA

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments are 2.9 percent of tier 1 capital allocated to the AA. A significant majority or 81.2 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including community service, affordable housing, and revitalization/stabilization for low- and moderate-income individuals and geographies. Seventy percent of current period investments focused on community service while 29.1 percent related to affordable housing. Current and prior period investments created or retained 14,328 low- and moderate-income housing units for individuals and families. The bank provided 118 grants totaling \$12.7 million to a variety of organizations that support community service, revitalization/stabilization, and affordable housing needs. In some occurrences, grants were provided in multiple years.

The bank makes significant use of innovative and/or complex investments to support CD initiatives. The bank made 29 current and prior period complex CD investments totaling \$172.8 million (42 percent) of total investments. Complex investments were related to affordable housing and community services through Direct Investor LIHTC and NMTC programs. LIHTC investments require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. Twenty-two (5.5 percent) of current period investments were catalysts for future growth and other improvements.

Examples of CD investments in the AA include:

- The bank made a \$14.5 million single investment and Direct Investor LIHTC transaction with an organization to provide 110 rental units to low- and moderate-income seniors 55 and over in the AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination, it monitors construction quality, lease-up and performance of the property through stabilization. The bank manages the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- The bank made a \$2.2 million NMTC investment with a community organization that reaches approximately 2,000 at-risk children annually through their mentoring program in this AA. In 2015 the organization was forced to vacate its home due to safety concerns, and in 2017 was still operating out of donated temporary space that was not ideally suited to meet the needs of the AA's at-risk youth. The purpose of the bank's investment was to help fill the gap, so the building project can be completed on time without significantly curtailing services provided by the community organization.
- The bank made a \$14.4 million single investment and Direct Investor LIHTC transaction to provide 102 rental units to low- and moderate-income individuals and families in the AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination it monitors construction quality, lease-up and performance of the property through stabilization. The bank will manage the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- The bank made eight investments totaling \$38.9 million in municipal bonds used to finance the construction or rehabilitation of affordable rental housing. The proceeds may also be used to help low- and moderate-income individuals and families purchase a home. This investment was in response to the needs of local agencies seeking investors for affordable housing programs in this AA.
- The bank provided four grants totaling \$435 thousand to a non-profit community development organization that aligns with a government economic revitalization or stabilization plan. Part of this funding was in response to the need to preserve and improve unsubsidized rental housing in a neighborhood where 435,000 low-income households spend over 30 percent of their income on housing and/or living in substandard conditions.
- The bank provided a \$300 thousand grant to an organization that serves economically disadvantaged families that need multiple supportive services to become financially resilient. The knowledge, support, and practices provided can empower these low- and moderate-income families and increase their financial capability.

Dallas CSA

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments are 2.1 percent of tier 1 capital allocated to the AA. A large majority (84.2 percent) of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including affordable housing, community services, and revitalize/stabilize for low- and moderate-income individuals and geographies. Current period investments were mainly 85.2 percent affordable housing, 10.5 percent community service, and 4.1 percent revitalization/Stabilization. Current and prior period investments created or retained 11,220 low- and moderate-income housing units for individuals and families. In the current period the bank provided 128 grants totaling \$17.7 million to a variety of organizations that support community service, revitalization/stabilization, and affordable housing needs. In some occurrences, grants were provided in multiple years.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. The bank made 22 complex investments totaling \$211.7 million or 70.9 percent of current period investments. Complex investments were related to affordable housing and community services through Direct Investor LIHTC and NMTC programs. Thirteen investments or 86.8 percent of the dollar volume were Direct Investor LIHTC transactions; seven were related to NMTCs. Direct Investor LIHTC investments require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. Fourteen (10.4 percent) of current period investments were catalysts for future growth and other improvements.

Examples of CD investments in the AA include:

- The bank made a \$12.4 million single investment and Direct Investor LIHTC transaction with an organization to provide 65 rental units to low- and moderate-income individuals and families in the AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination it monitors construction quality, lease-up and performance of the property through stabilization. The bank manages the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- The bank made two LIHTC investments totaling \$8.7 million to provide 193 rental units to low- and moderate-income individuals and families in the AA. The bank invested in this multi-investor fund primarily to diversify and meet affordable housing needs in these areas that are difficult to penetrate directly because regional multi-investor fund syndicators exercise significant control over these markets.
- The bank provided \$7.4 million in NMTC financing to support the development of healthy food options, the expansion of vital community services, and the growth of employment opportunities in the most disinvested parts of Dallas, with the expansion of a new facility. Chase partnered with other CDEs that provide allocation to a project by providing the final component of allocation necessary to ensure the project's success.

- The bank provided two grants totaling \$357 thousand to a non-profit organization that empowers creativity and helps build social and emotional well-being for 151,000 youth in this AA by bringing arts and cultural performances into classrooms. Many students from participating schools come from low- and moderate-income families and are eligible for Federal Free or Reduced lunch programs.

Austin MSA

The bank's performance in the Austin-Round Rock-Georgetown MSA is excellent. The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments are 8.4 percent of tier 1 capital allocated to the AA. A large majority (81.1 percent) of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including affordable housing, community services, and revitalize/stabilize for low- and moderate-income individuals and geographies. CD investments included 88.4 percent affordable housing and 11.6 percent community service. Current and prior period investments created or retained 4,985 low- and moderate-income housing units for individuals and families. The bank provided 38 grants totaling \$2.3 million to a variety of organizations that support community service and affordable housing. In some occurrences, grants were provided in multiple years.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. The bank made six complex investments totaling \$57.1 million or 81.9 percent of current period investments; four were related to Direct Investor fund LIHTCs. Direct Investor LIHTC investments require bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. Two current period investments were catalysts for future growth and other improvements.

Examples of CD investments in the AA include:

- The bank made an \$11.7 million single investment and Direct Investor LIHTC transaction to provide 60 rental units to low- and moderate-income individuals and families in the AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination, it monitors construction quality, lease-up and performance of the property through stabilization. The bank will manage the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.
- The bank provided a \$14.1 million single investor LIHTC investment to fund an affordable housing project to provide 122 rental units to low- and moderate-income individuals and families in this AA. The bank does not use a syndicator but employs a multi-disciplined approach that focuses on the long-term nature of the investment. The bank performs all the functions a syndicator would perform through in-house expertise. The bank conducts the underwriting, pricing, and due diligence prior to originating the investment. After origination, it monitors construction quality, lease-up and performance of the property through stabilization. The bank manages the asset for the entire fifteen-year hold period, ensuring compliance with the LIHTC program and conducting annual on-site inspections.

- The bank partnered with a non-profit food bank organization to provide \$6.2 million in NMTC financing. The organization will provide much needed services to low- and moderate-income communities to help create healthy neighborhoods. Funding provided by the bank is considered a gap filler, which ensures that projects receive enough of a subsidy to be viable.

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

Qualified Investments - State of Texas										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Houston-The Woodlands-Sugar Land MSA	70	77,200	160	334,353	230	28.3	411,553	26.7	0	0
Dallas-Fort Worth CSA	49	56,239	157	298,780	206	25.4	355,019	23.0	0	0
Austin-Round Rock-Georgetown MSA	24	15,681	49	67,430	73	9.0	83,110	5.4	0	0
Limited Review:										
Abilene MSA	3	270	1	8,050	4	0.5	8,319	0.5	0	0
Amarillo MSA	2	667	1	11,889	3	0.4	12,556	0.8	0	0
Beaumont-Port Arthur MSA	8	6,934	3	13,973	11	1.4	20,907	1.4	0	0
Brownsville-Harlingen MSA	20	6,898	9	73,453	29	3.6	80,351	5.2	0	0
College Station-Bryan MSA	1	3,418	3	33,117	4	0.5	36,535	2.4	0	0
El Paso MSA	16	7,640	31	105,096	47	5.8	112,736	7.3	0	0
Killeen-Temple MSA	2	446	1	11,979	3	0.4	12,425	0.8	0	0
Laredo MSA	0	0	1	11,682	1	0.1	11,682	0.8	0	0
Longview MSA	1	5	0	0	1	0.1	5	0.0	0	0
Lubbock MSA	2	7,102	3	38,298	5	0.6	45,400	2.9	0	0
McAllen-Edinburg-Mission MSA	11	289	13	107,058	24	3.0	107,347	7.0	0	0
Midland-Odessa CSA	3	5,169	2	12,015	5	0.6	17,185	1.1	0	0
San Antonio-New Braunfels MSA	24	14,224	45	100,370	69	8.5	114,594	7.4	0	0
Tyler MSA	1	623	0	0	1	0.1	623	0.0	0	0
Waco MSA	1	70	1	13,370	2	0.2	13,440	0.9	0	0
Wichita Falls MSA	2	201	2	1,504	4	0.5	1,705	0.1	0	0
TX Non-MSA Total (Brenham, Corsicana, Marshall, Levelland, and Fredericksburg)	4	191	1	482	5	0.6	674	0.1	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0		85,182	49	6.0	85,182	5.5	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	35	11,159	1	26	36	4.4	11,185	0.7	0	0

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

Statewide Investments in State of Texas

Statewide Investments with a P/M/F included investments related to affordable housing, community services, and revitalization/stabilization. Nineteen investments totaling \$59 million were made for affordable housing. Twenty-nine grants totaling \$22.2 million were provided to a variety of organizations, primarily agencies administering financial education services. Occasionally, grants were made annually. The level of investments had a positive impact on the Investment Test rating for the state of Texas.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Wichita Falls MSA is consistent with the bank's overall good performance under the Investment Test in the full-scope areas. The bank's performance under the Investment Test in the Abilene MSA, Amarillo MSA, Beaumont-Port Arthur MSA, Brownsville-Harlingen MSA, College Station-Bryan MSA, El Paso MSA, Killeen-Temple MSA, Laredo MSA, Lubbock MSA, McAllen-Edinburg-Mission MSA, Midland-Odessa CSA, San-Antonio-New Braunfels MSA, and Waco MSA is stronger than the bank's overall performance in the full-scope areas due to a higher level of qualified investments in relation to allocated tier 1 capital. The bank's performance in the Longview MSA, Tyler MSA, and Texas Non-MSA is weaker than the bank's overall good performance under the Investment Test in the full-scope areas due to the low level of qualified investments in relation to allocated tier 1 capital.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, including the data in the tables below, the bank's performance in the Dallas CSA is excellent and in the Houston MSA is good. The bank's performance in the Austin MSA is adequate. More weight was given to performance in the Dallas CSA and Houston MSA due to the bank's larger deposit and branch presence.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Houston MSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is near to the percentage of the population. The bank had 15 branches in low-income geographies and 37 branches in moderate-income geographies. The distribution was augmented by two MUI tract branches that serve low-income tracts and 28 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Dallas CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution is below and is near to the percentage of the population. The bank had 13 branches in low-income geographies and 47 branches in moderate-income geographies. The distribution was augmented by six MUI tract branches that serve low-income tracts and 32 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Austin MSA

Based on the data in the table below and performance context, the branch distribution is adequate. In low- and moderate-income geographies, the distribution is near to and well below the percentage of the population. The bank had four branches in low-income geographies and three branches in moderate-income geographies. The distribution was augmented by five MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Houston-The Woodlands CSA	42.8	185	34.2	8.1	20.0	17.8	54.1	11.6	25.9	27.9	34.2
Dallas-Fort Worth CSA	50.4	211	39.0	6.2	22.3	23.7	46.9	10.7	24.9	30.4	33.8
Austin-Round Rock-Georgetown MSA	3.0	52	9.6	7.7	5.8	38.5	48.1	10.1	22.3	37.3	29.2

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

Houston MSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 681 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 54.3 percent over the prior rating

period to 83 (12.2 percent) deposit-taking ATMs in low-income geographies and 164 (24.1 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Dallas CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 680 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 63.1 percent over the prior rating period to 47 (6.9 percent) deposit-taking ATMs in low-income geographies and 188 (27.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Austin MSA

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 121 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The number of deposit-taking ATMs in low- and moderate-income geographies decreased by 26.7 percent from the prior rating period to 19 (15.7 percent) deposit-taking ATMs in low-income geographies and seven (5.8 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Houston-The Woodlands CSA	12	44	-8	-7	-11	-6
Dallas-Fort Worth CSA	11	44	-3	-6	-14	-8
Austin-Round Rock-Georgetown MSA	3	16	-1	0	-8	-6

Houston MSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open any branches in the low- and moderate-income geographies

and closed eight branches in low-income and seven branches in moderate-income geographies. Branch closure rationale included reduced customer usage, unprofitability, branch consolidations, safety issues, and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 4:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Dallas CSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open any branches in the low- and moderate-income geographies and closed three branches in low-income and six branches in moderate-income geographies. Branch closure rationale included reduced customer usage, unprofitability, branch consolidations, and proximity to other Chase branches. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 4:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Austin MSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open any branches in the low- and moderate-income geographies and closed one branch in a low-income geography. The branch closure was due to its proximity to another Chase branch. Despite the branch closure, branch locations generally remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank provided a significant level of CD services in the Houston MSA and Dallas CSA, and an adequate level of CD services in the Austin MSA. The provided services were responsive to the needs of the full-scope AAs.

Houston MSA

Bank employees provided their financial or job-specific expertise and/or technical assistance for 2,609 qualified CD activities to 58 organizations for a total of 9,450 hours during the evaluation period. Most

of the bank's assistance went to organizations that provide services to low- and moderate-income individuals and families. These services were responsive to the needs for financial literacy and affordable housing. The following are examples of CD services provided in this AA:

- Bank employees provided 247 financial literacy workshops for low- and moderate-income customers through partnership with a nonprofit organization benefitting 4836 low- and moderate-income individuals.
- Bank employees held four affordable homeownership seminars serving 155 low- and moderate-income individuals one on one with the basics of obtaining a mortgage.

Dallas CSA

Bank employees provided their financial or job-specific expertise and/or technical assistance for 1,884 qualified CD activities to 47 organizations for a total of 8,619 hours during the evaluation period. Most of the bank's assistance went to organizations that provide services to low- and moderate-income individuals and families. These services were responsive to the needs for affordable housing and technical assistance. The following are examples of CD services provided in this AA:

- Bank employees provided 779 pre-purchase homebuyer education seminars for low- and moderate-income customers. The educational curriculum is provided by a HUD-approved nonprofit housing counseling agency. The seminar is offered either in person or through webinar.
- Bank employees provided 2,318 hours and 505 technical assistance services for not-for-profits that serve low- and moderate-income individuals and communities.

Austin MSA

Bank employees provided their financial or job-specific expertise and/or technical assistance for 499 qualified CD activities to 14 organizations for a total of 2,120 hours during the evaluation period. Most of the bank's assistance went to organizations that provide services to low- and moderate-income individuals and families. These services were responsive to the needs affordable housing and financial education. The following are examples of CD services provided in this AA:

- Bank employees provided 61 homebuyer education seminars benefiting 265 low- and moderate-income customers.
- Bank employees provided more than 1148 hours of first-time homebuyer educational service to low- and moderate-income customers as a voluntary option during the homebuying process from third-party organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and had a marginally negative affect on the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Abilene MSA, Brownsville-Harlingen MSA, El Paso MSA, and TX Non-Metro AAs is stronger than the bank's overall performance under the Service Test in the full-scope areas due to

stronger branch distribution in low- and moderate-income geographies. The bank's performance under the Service Test in the Amarillo MSA, Beaumont-Port Arthur MSA, College Station-Bryan MSA, Killeen-Temple MSA, Laredo MSA, Longview MSA, Lubbock MSA, McAllen-Edinburg-Mission MSA, Midland MSA, Odessa MSA, San Antonio-New Braunfels MSA, Tyler MSA, Waco MSA, and Wichita Falls MSA is weaker than the bank's overall performance under the Service Test in the full-scope area due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Utah

CRA rating for the State of Utah²⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- An excellent level of lending activity.
- An excellent geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- A relatively high level of CD loans, which positively affected the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- A good level of qualified investments that demonstrated excellent responsiveness to community economic development needs.
- The extensive use of complex investments.
- Retail service delivery systems that are readily available to geographies and individuals of different income levels.
- Leadership in providing CD services that are responsive to AA needs.

Description of Institution's Operations in Utah

The state of Utah is Chase's 13th rating area based on its total deposits of \$13.3 billion, representing 1.0 percent of the bank's total deposits. As of December 31, 2019, the bank operated 49 branches and 92 deposit-taking ATMs within the rating area, representing 0.9 percent of total branches and 0.5 percent of total ATMs. The bank has delineated four AAs in the state of Utah. The bank originated and purchased approximately \$7.6 billion in loans or 1.1 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data as of June 30, 2019, there were 51 banks operating 512 branches in the state of Utah. The bank maintained 49 offices with deposits of \$13.2 billion, ranking it 9th in deposit market share in the state with 2.3 percent. Major competitors in the state include Ally Bank with 20.5 percent market share. Morgan Stanley with 19.6 percent market share, and American Express National Bank with 12.58 percent market share.

The bank delineated four AAs in the state of Utah. The Salt Lake City-Provo-Orem, UT CSA (Salt Lake City CSA), which accounts for 95.1 percent of deposits in the state of Utah, received a full-scope review. The St. George MSA, Logan MSA, and UT Non-Metro AA received limited-scope reviews. The delineated AAs are described in appendix A.

Description of Full-Scope AA

The Salt Lake City CSA consists of the Salt Lake City MSA, Provo-Orem MSA and Ogden-Clearfield MSA. The bank defines the AA as the entire Salt Lake City MSA, Utah County in the Provo-Orem MSA, and Davis and Weber counties in the Ogden-Clearfield MSA.

The following table provides a summary of the demographics that includes housing and business information for the Salt Lake City CSA. Table A indicates that the volume of OOU's is small in low-income census tracts (1.3 percent) and over 21.7 percent of families in the AA are low-income. The Salt Lake City CSA's higher cost of housing also limits access to affordable homeownership among LMI borrowers. The median housing value in the Salt Lake City CSA is 3.3 times the averaged median income, 4.1 times the moderate-income, and 6.6 times the low-income, indicating a large proportion of OOU's are unaffordable to most low-income and many moderate-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Salt Lake City CSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,140 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$116,256 mortgage with a payment of \$1,054 per month; a moderate-income borrower earning \$56,224 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$216,757 mortgage with a payment of \$1,687 per month.

Median rents and the significant percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 482 Salt Lake City-Provo-Orem UT CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	455	5.1	21.1	42.9	29.9	1.1
Population by Geography	2,253,864	3.8	19.8	46.0	29.9	0.4
Housing Units by Geography	737,834	3.9	22.1	45.4	28.2	0.4
Owner-Occupied Units by Geography	479,565	1.3	15.7	48.5	34.3	0.2
Occupied Rental Units by Geography	217,469	9.5	35.3	39.7	14.8	0.7
Vacant Units by Geography	40,800	5.0	27.6	39.2	28.2	0.1
Businesses by Geography	212,169	3.9	17.7	42.5	35.5	0.5
Farms by Geography	3,899	2.4	15.0	46.8	35.6	0.2
Family Distribution by Income Level	523,009	19.0	18.1	22.7	40.1	0.0
Household Distribution by Income Level	697,034	21.7	16.8	21.1	40.4	0.0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$71,742	Median Housing Value			\$230,725
Median Family Income MSA - 39340 Provo-Orem, UT MSA		\$67,248	Median Gross Rent			\$937
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Families Below Poverty Level			8.9%

Source: 2015 ACS and 2019 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.*

Economic Data

According to the Moody's Analytics November 2019 report, Salt Lake City has a strong economy and a strong quality of life. Strengths include sturdy house price appreciation, lots of high-wage jobs in tech and other knowledge-based industries, below-average business costs, business-friendly climate, well-educated workforce, and a high concentration of prime-age adults. However, it is limited in the availability of office space and exposure to federal fiscal policy. Since the Great Recession the state has maintained balanced budgets by avoiding an overhaul of its tax and spending policies, while expanding services and employment. An educated workforce has been key to fueling growth in knowledge-based industries. The metro area's population growth was more than double the country's in 2018 and will continue to impress as robust job additions and reasonable costs relative to the rest of the West attract residents from elsewhere. More educated workers with high wages will power gains in retail and leisure spending while spurring faster household formation, which in turn benefits the housing market.

Economic drivers include finance, high tech, and state capital. Major employment sectors include professional and business services, government, education and health services and retail trade. In addition to federal, state, and local government, major employers in the University of Utah, Intermountain Health Care Inc., Walmart, Delta Airlines and Smith's Food & Drug.

Community Contacts

Two community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing, community services and economic development. Contacts noted there is a housing shortage in Salt Lake County, specifically in multi-family housing and affordable housing. Middle and upper-income Utahans are faring better than low- and moderate-income constituents after the great recession. Low-income populations have not benefitted from the economic recovery in the same way as affluent populations. The technology industry is causing rents to increase and become unaffordable to low-income populations. There is a growing homeless population as social service programs dwindle, and the resources available to assist the homeless continue to disappear. Student loan debt is impacting housing affordability and exacerbated by increased rental prices adding to the homeless situation. Predatory lending is a challenge. Nonprofit program and infrastructure support, such as IT and marketing are critical. Some nonprofits had to cease operations due to lack of funding and support. Other needs mentioned for the area include:

- Workforce housing
- Small dollar loans
- Need more micro-loans for small business
- Affordable rental housing
- Technical assistance for small businesses
- Community services for the large refugee population
- Support for financial education
- First time homebuyer counseling
- Down payment assistance

Scope of Evaluation in Utah

The rating for the state of Utah is based on an evaluation of the bank's performance in all AAs as listed in appendix A. The Salt Lake City CSA accounts for 95.1 percent of deposits in the state of Utah and received a full-scope review. The remaining three AAs in the state of Utah received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN UTAH

LENDING TEST

The bank's performance under the Lending Test in the state of Utah is rated Outstanding.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA is excellent. Overall excellent lending levels, excellent geographic distribution of loans, offset weaker but good borrower distribution. A relatively high level of CD lending and product innovation and flexibility was considered favorably when determining the rating.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 31.8 percent and 67.7 percent of the loan volume in the state by number and 83.8 and 14.2 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal

weight in reaching conclusions. Farm loans represented 0.43 percent of the loan volume in the state by number and 0.05 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City-Provo-Orem CSA	18,456	39,592	191	16	58,255	84.7	95.1
Logan MSA	713	1,714	52	0	2,479	3.6	0.7
St. George MSA	1,335	2,861	28	0	4,224	6.1	1.4
UT Non-Metro AA	1,422	2,411	25	0	3,858	5.6	2.9
Total	21,926	46,578	296	16	68,816	100	100

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

Dollar Volume of Loans* (in \$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salt Lake City-Provo-Orem CSA	4,925,658	952,464	2,655	145,262	6,026,039	79.7	95.1
Logan MSA	134,347	31,384	581	0	166,312	2.2	0.7
St. George MSA	342,650	41,463	280	0	384,393	5.1	1.4
UT Non-Metro AA	936,038	50,357	277	0	986,672	13.0	2.9
Total	6,338,693	1,075,668	3,793	145,262	7,563,416	100.0	100

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

Chase ranked 59th in deposits with 0.3 percent market share.

In overall home mortgage lending, Chase ranked seventh out of 438 lenders with a 3.1 percent market share. Other lenders in the market include America First (9.3 percent), Wells Fargo Bank, N.A. (7.1 percent), and Mountain America (5.8 percent).

In small loans to businesses, Chase ranked second out of 138 lenders with 17.7 percent market share. Other major lenders are American Express National Bank (26.6 percent), Citibank, N.A. (10.0 percent), and Wells Fargo Bank, N.A. (9.9 percent),

In small loans to farms, Chase ranked first out of 18 lenders with a 29.6 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (22.8 percent), Zions Bank, N.A. (12.2 percent), and People's InterMountain Bank, N.A. (8.5 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 Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Examiners considered the limited proportion of housing units in low-income geographies, particularly OOU's (1.3 percent), which constrained lending opportunities.
- The high level of competition in the AA was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas exceeded the percentage of owner-occupied units and aggregate distribution of loans. In moderate-income areas the proportion of loans was near to the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies exceeded the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was below the percentage of owner-occupied units and the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- Examiners considered the small proportion of businesses in low-income geographies (3.9 percent) and competition between 438 lenders constrained lending opportunities to existing businesses.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies exceeded both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies exceeded both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was near to both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Utah 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is adequate. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies, (2.4 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution of all lenders.
- During 2014 to 2016, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies exceeded both the proportion of farms in those geographies and the aggregate distribution for the respective geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 Utah section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low- and moderate-income borrowers.

- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016 the bank's performance was generally consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded the proportion of moderate-income families and was below the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of Utah 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to businesses with revenues of \$1 million or less below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank 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's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 16 CD loans totaling \$145.3 million. This represents 8.9 percent of the tier 1 capital allocated to the AA. Most of the CD loans (73 percent) were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- The bank originated a \$15.3 million construction loan for the acquisition and development of affordable housing in a moderate-income census tract in Salt Lake City. The project is Phase I of a four phase development and will contain 118 units of housing. Eighty-four units in the project are affordable to families with incomes of 50 percent or less of the moderate-income and 34 units will be market rate. Of the 118 units, 10 units are set aside for veterans, five units will be set aside for previously homeless individuals, nine units are designed for occupancy by handicapped individuals, and two units are set aside for large families. The project has also entered a memorandum of understanding with the local Public Housing Authority to accept qualified Section 8 tenants.
- The bank originated a \$16.1 million construction loan for affordable housing in Salt Lake City. Located in a moderate-income census tract, the project will comprise 126 units of affordable housing and 37 units at market rates. This financing funds Phase 2 of a 4 Phase project. Of the 126 units, 11 are set aside for veterans and five units will be set aside for previously homeless individuals. The project has also entered a memorandum of understanding with the local Public Housing Authority to accept qualified Section 8 tenants.
- The bank originated a \$12.0 million construction loan to purchase bonds for the construction of affordable housing in Salt Lake City. The project is located in a moderate-income census tract and is comprised of 134 units. The development will have 120 units restricted for low- and moderate-income individuals, with 10 units set aside for veterans, 13 units set aside for large families, and seven units that are Type A Wheelchair Accessible Units. The project has also entered a memorandum of understanding with the local Public Housing Authority to accept qualified Section 8 tenants.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. A total of 4,535 loans were funded totaling \$1 billion. Refer to the comments in the Product

Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	896	216,493
FHA	998	193,829
HARP	1,187	220,434
VA	511	139,578
SBA	592	88,169
USDA	351	176,793

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the St. George MSA, Logan MSA, and UT Non-Metro AA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Performance is weaker primarily due to weaker geographic and borrower income distributions and the lack of CD lending. The limited-scope AAs represent less than five percent of the state's deposits.

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

INVESTMENT TEST

The bank's performance under the Investment Test in state of Utah is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA is good.

The bank has a good level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 4.0 percent of tier 1 capital allocated to the AA. A significant majority or 90 percent are current period investments

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA, including affordable housing, community services, and revitalization/stabilization for low- and moderate-income individuals and geographies. Eight CD investments total \$57.9 million with 83.5 percent, 11.4 percent, and 5.15 percent focusing on affordable housing, community services, and revitalization/stabilization. Eleven grants total \$515,000 with 53.4 percent supporting community services, 29.1 percent supporting economic development, 9.7 percent affordable housing, and 7.8 percent revitalization/stabilization.

The bank makes significant use of complex investments to support CD initiatives. Six complex current period CD investments and grants totaling \$27.1 million or 46 percent of total current period investments consist primarily of single investor fund/Direct Investor LIHTC and NMTC transactions.

Seven prior period CD investments totaling \$6.3 million or 97 percent of prior period investments consist of single investor fund/Direct Investor LIHTC transactions. Four CD investments and grants serve as catalyst investments that encourage future growth, improvements, or community revitalization/stabilization.

Examples of community development investments in the AA include:

- The bank originated a \$3.3 million NMTC equity investment for the facility to serve patients seeking cancer treatment services and support in Salt Lake City. This investment serves the needs of adult patients seeking cancer treatment services. The facility has 42 patient suites to serve 800 adult patients annually at no cost along with access to other cancer support services for patients requiring lifesaving, medically prescribed treatment and financial resources, legal aid, food assistance, and clinical trials. The facility is comprehensive resource for heavily burdened patients in an increasingly complex healthcare delivery system.
- The bank invested \$30.0 million in Freddie Mac Multifamily ML Certificates Series ML-05 Bonds. Proceeds of the bonds were used for the acquisition of two multifamily housing properties located in Salt Lake County. The properties consisted of a total of 408 units, of which 400 are affordable to those earning less than 80 percent AMI.
- The bank originated a \$10.8 million LIHTC investment. The property consists of 105 one- and two-bedroom units for seniors at a variety of income levels with the majority ranging from 25 percent AMI to 50 percent AMI. Services were provided at no charge to the tenants and were facilitated by Utah Independent Living Center, Department of Veterans Affairs, or the Road Home.

Qualified Investments – State of Utah										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Salt Lake City-Provo-Orem CSA	16	6,537	19	58,513	35	89.7	65,051	99.46	0	0
Limited Review:										
Logan MSA	2	20	1	16	3	7.7	36	0.05	0	0
St. George MSA	0	0	0	0	0	0.00	0	0.00	0	0
UT Non-Metro AA	0	0	1	319	1	2.6	319	0.49	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.

Statewide Investments in the State of Utah

The bank has 19 current and prior period CD investments and grants with and without a purpose, mandate, or function to serve AAs in the broader statewide area. Fifty percent supports affordable housing and 50 percent supports community services. These statewide investments further support the bank’s overall good performance under the Investment Test in the state of Utah.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Investment Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Logan MSA, St. George MSA, and UT Non-Metro AA is weaker than the bank's overall performance under the Investment Test in the full-scope area. Performance is weaker due to a lower level of investments in each of the three AAs in relation to tier one capital.

SERVICE TEST

The bank's performance under the Service Test in state of Utah is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA. Based on the data in the table below, the branch distribution in low- and moderate-income geographies exceeds the percentage of the population in these respective geographies.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Salt Lake City-Provo-Orem CSA	95.1	40	81.6	10.0	30.0	32.5	27.5	3.8	20.2	46.1	29.5

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 78 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 61.9 percent over the prior rating period to seven (9.0 percent) deposit-taking ATMs in low-income geographies and 27 (34.6 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Salt Lake City-Provo-Orem CSA	2	14	0	-2	-8	-2

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in the low-income geographies and closed two branches in moderate-income geographies. Branch closures were due to poor location and reduced customer usage. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA, particularly moderate-income geographies and/or individuals. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank was a leader in providing CD services that are responsive to AA needs.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 477 qualified CD service activities to 27 organizations since the last evaluation, logging a total of 1,612 hours. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were very responsive to the community needs in the AA, particularly affordable housing. The following are examples of CD services provided:

- The bank provided financial incentives to 112 low- and moderate-income homebuyers to take homebuyer education from third-party organizations.
- Five bank employees provided financial literacy seminar/webinar training to low- and moderate-income participants by providing the material and options for residents to reach the goal of homeownership. To date these seminars has helped more than 4000 families in over 125 Utah communities become homeowners.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Service Test rating and did not significantly change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the UT Non-Metro AA is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Logan MSA and St. George MSA is weaker than the bank's overall performance in the full-scope area due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Washington

CRA rating for the State of Washington²⁸: 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:

- A good level of lending activity.
- Good geographic distribution of home mortgage loans and small loans to businesses.
- Good borrower distribution of home mortgage loans and small loans to businesses.
- Leadership in making CD loans in the Seattle-Tacoma CSA, which had a significantly positive affect on the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified CD investments that displayed excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex qualified investments.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels.
- A significant level of CD services that were responsive to AA needs.

Description of Institution's Operations in Washington

The state of Washington is Chase's 8th largest rating area based on aggregate deposits of \$32.4 billion, representing 2.5 percent of the bank's total deposits. As of December 31, 2019, the bank operated 182 branches and 320 deposit-taking ATMs within the rating area, representing 3.7 percent of total branches and 1.9 percent of total ATMs. The bank originated and purchased approximately \$26.4 billion in loans or 3.8 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data, as of June 30, 2019, there were 77 banks operating 1,670 branches in the state of Washington. Chase ranks 3rd in deposit market share with 11.6 percent. Major competitors in the state based on deposit market share include Bank of America, N.A. (20.8 percent), Wells Fargo Bank, N.A. (11.6 percent), and U.S. Bank, N.A. (9.9 percent).

The bank delineated seven AAs in the state of Washington. The Seattle-Tacoma CSA (Seattle CSA) and the Spokane-Spokane Valley MSA (Spokane MSA), which combined account for 95.2 percent of the deposits and 88.0 percent of lending, received full-scope reviews. The Bellingham MSA, Kennewick-Richland-Walla Walla CSA, Wenatchee MSA, Yakima MSA, and WA Non-Metro AA received limited-scope reviews. Refer to appendix A for a complete description of each AA.

Description of Full-Scope AAs

Seattle CSA

The bank defines its AA as the entire Seattle CSA. According to FDIC Deposit Market Share Data as of June 30, 2019, the bank-maintained \$15.5 billion in deposits in the AA, ranking 3rd in deposit market share with 12.4 percent. As of December 31, 2019, the bank operated 159 branches and 294 deposit-taking ATMs in the area, accounting for 3.2 percent of bank branches and 1.8 percent of bank deposit-taking ATMs.

The following table provides a summary of the demographics that includes housing and business information for the Seattle CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (2.2 percent) and over 20.8 percent of families in the AA are low-income. The Seattle CSA's high cost of housing also limits access to affordable homeownership among LMI borrowers. The median housing value across the Seattle CSA ranges from four to six times the median income, over five times the moderate-income, and more than seven times the low-income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Seattle CSA, assuming a 30-year mortgage with a five percent interest rate, three percent down payment, homeowners insurance, real estate taxes, and not accounting for any additional monthly expenses, a low-income borrower making \$37,210 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$126,094 mortgage with a payment of \$1,116 per month; a moderate-income borrower earning \$59,536 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$232,545 mortgage with a payment of \$1,786 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	912	4.7	21.6	45.3	27.3	1.1
Population by Geography	4,467,503	4.8	21.8	45.6	27.6	0.2
Housing Units by Geography	1,876,128	4.7	21.3	45.7	28.2	0.1
Owner-Occupied Units by Geography	1,059,645	2.2	16.7	48.5	32.6	0.0
Occupied Rental Units by Geography	670,235	8.6	28.5	41.0	21.7	0.3
Vacant Units by Geography	146,248	4.9	21.3	46.9	26.8	0.1
Businesses by Geography	354,032	5.1	19.2	41.5	33.9	0.3
Farms by Geography	9,015	2.9	16.4	49.2	31.5	0.1
Family Distribution by Income Level	1,099,746	20.8	17.7	21.1	40.4	0.0

Household Distribution by Income Level	1,729,880	23.4	16.2	18.5	41.9	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA		\$75,652	Median Housing Value			\$327,206
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$65,272	Median Gross Rent			\$1,162
Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA		\$74,420	Families Below Poverty Level			7.6%
Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA		\$92,317				
Median Family Income MSA - 45104 Tacoma-Lakewood, WA		\$71,304				
Median Family Income Non-Metro - WA		\$58,240				

Source: 2015 ACS and 2019 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.

Economic Data

According to Moody's Analytics November 2019 Report, the Seattle area economy is strong. The area has a highly trained and well-educated workforce; a relatively high per capita income; and is a global center for cloud computing and software development. Job and labor force gains have accelerated over the past year, and residential and commercial construction is firming after a hiccup late last year. Technology is a major economic driver with companies such as Amazon and Microsoft continuing their expansion in the area. Amazon's workforce has grown by almost 25 percent in the 2 years since the completion of its South Lake Union campus. Google has also opened new offices in the area which will increase the competition for top technology talent. Boeing, which is the largest employer in the area, has experienced some troubles related to safety issues with its 737 Max Jet. Other major employers in the area include Amazon, Microsoft, and the University of Washington. Housing affordability is an issue in the area, and although house price appreciation is no longer outpacing incomes, two years of double-digit gains have eroded potential buyers' purchasing power. Declining affordability and slower growth in mid-paying jobs pose a risk to the outlook for homebuilding. Although housing affordability is about even with the national average, broad measures of affordability belie a skewed income distribution that has grown more so with the shift in Seattle's industrial base from manufacturing to information technology.

Community Contacts

Six community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing, economic development, and community services. Contacts noted that there is a severe affordable housing shortage in the area. Low- and moderate-income residents are being pushed further away from Seattle into communities that do not provide access to the transportation, employment, or services they need. Residents with Section 8 (Housing Choice) vouchers have difficulty finding landlords willing to rent to them; while residents with disabilities are paying so much for rent, they cannot afford needed assistance devices like hearing aids. Many neighborhoods have either already

gentrified or are gentrifying and for every affordable housing project that comes online, there are hundreds of individuals and households on the waiting list. Property taxes are rising in the area, which is bringing financial pressure to senior and low- and moderate-income homeowners. The Hispanic population is growing in the more rural parts of the AA. The disparity between rural and urban communities within the AA is growing in terms of costs, access to affordable housing stock, and access to services. Contacts identified a number of needs in the area including:

- Affordable housing for low- and moderate-income residents
- Home modifications for aging baby boomers
- Greater access to banking services in the rural portions of the AA
- Greater broadband access in rural communities
- Financial education and counseling, particularly for youth, and second chance checking accounts
- Home evictions and property taxes are rising
- Micro-loans for small businesses
- Debt financing for affordable housing developers
- Funding support for CDFIs and Nonprofits
- Rural broadband

Contacts noted that there are multiple opportunities available in the area for banks serving the community including general community development support; small business lending and technical assistance; asset development; and providing low-cost financial services.

Spokane MSA

The bank defines its AA as the entire Spokane MSA. According to FDIC Deposit Market Share Data as of June 30, 2019, the bank maintained nearly \$740.0 million in deposits in the AA, ranking 5th in deposit market share with 8.1 percent. As of December 31, 2019, the bank operated 12 branches and 17 deposit-taking ATMs in the AA, representing 0.2 percent of total bank branches and 0.1 percent of total bank ATMs.

The following table provides a summary of the demographics that includes housing and business information for the Spokane MSA. Table A indicates that the volume of OOUs is small in low-income census tracts (0.1 percent) and over 24.4 percent of families in the AA are low-income. The Spokane MSA's cost of housing also limits access to affordable homeownership among low-income borrowers. The median housing value in the Spokane MSA is three times the median income, over five times the moderate-income, and more than seven times the low-income, indicating a limited proportion of OOUs are affordable to low- and moderate-income borrowers. 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.

In the Spokane MSA, assuming a 30-year mortgage with a five percent interest rate, three percent down payment, homeowners insurance, real estate taxes, and not accounting for any additional monthly expenses, a low-income borrower making \$31,032 per year (or less than 50 percent of the FFIEC adjusted median family income in the CSA) could afford a \$147,921 mortgage with a payment of \$931 per month; a moderate-income borrower earning \$49,651 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$236,639 mortgage with a payment of \$1,489 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 518 Spokane-Spokane Valley WA MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	0.9	29.1	47.9	21.4	0.9
Population by Geography	524,380	0.6	27.0	45.2	26.4	0.8
Housing Units by Geography	226,646	0.5	28.4	44.9	24.9	1.2
Owner-Occupied Units by Geography	132,361	0.1	20.7	47.5	31.4	0.3
Occupied Rental Units by Geography	74,789	1.3	39.8	41.0	15.3	2.6
Vacant Units by Geography	19,496	0.5	37.1	42.6	17.7	2.1
Businesses by Geography	36,887	2.9	32.3	39.8	24.1	0.9
Farms by Geography	1,633	0.6	18.7	49.3	31.4	0.0
Family Distribution by Income Level	132,039	20.7	17.1	22.1	40.1	0.0
Household Distribution by Income Level	207,150	24.4	16.5	17.3	41.8	0.0
Median Family Income MSA - 44060 Spokane-Spokane Valley, WA MSA		\$62,064	Median Housing Value			\$189,335
			Median Gross Rent			\$779
			Families Below Poverty Level			10.5%
<i>Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics November 2019 Report, the Spokane area economy is stable. The area's strengths include stability from a large healthcare industry; a large student population that supports consumer industries; low cost of doing business; positive net-migration; and high industrial diversity. Healthcare will remain a key driver of job growth in the medium term and will add more than a quarter of all net new jobs over the next decade. Demand for medical care will be driven by an aging population. The area is home to Fairchild Airforce Base, which is the largest employer in the area and where recent expansion has led to an increase in construction hiring. The expansion of the Fairchild Air Force Base will support a broad array of industries in Spokane through 2021. Department of Defense expenditures in the area rose dramatically over fiscal 2019, which saw more than \$100.0 million spent on various construction services and supplies for new buildings and renovations at Fairchild AFB. The new federal spending will be spread between on-base facilities and off-base single-family housing for the 1,000 new airmen and family members who are arriving now. The unemployment rate in the area has risen, but only because the labor force is growing. In addition to Fairchild Airforce Base, other major employers in the area include Providence Healthcare – Eastern Washington; Northern Quest Resort Casino; and URM Stores. In addition, the area is the location of several colleges and universities including Eastern Washington University: Community Colleges of Spokane and Gonzaga University. Housing affordability has ticked up on the back of solid income growth.

Community Contacts

Community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing, economic development, and community services. Contacts noted that high poverty rates as well as high levels of unemployment and under employment were a concern, particularly in some neighborhoods in the northeast section of Spokane. This area also is lacking in available services to assist low-income individuals. The area has a growing refugee population that needs services and support. Contacts noted that the homeless population is growing and there is a need for services to assist this group. Vacant and abandoned properties are still a problem, particularly in the northeast part of the city. Other identified needs include:

- Focus on homeownership for low- and moderate-income individuals
- Micro-loans for entrepreneurs
- Workforce development training to provide greater access to living wage jobs
- Unrestricted grant dollars for nonprofit organizations
- Long term investments in financial literacy programs

Contacts indicated that opportunities are available for banks to support the needs in the community including general community development; affordable housing; workforce development; small business development; and asset development.

Scope of Evaluation in Washington

The Seattle CSA and Spokane MSA received full-scope reviews. The Seattle CSA and Spokane MSA combined account for 95.2 percent of the bank's deposits and 88.0 percent of lending in the state. More weight was placed on performance in the Seattle CSA based on the bank's higher level of deposits and lending. The remaining AAs in the state of Washington received a limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Seattle CSA and the Spokane MSA is excellent. Strong CD lending had a significantly positive effect on the overall good lending levels and good geographic and borrower distribution of loans. Product innovation and flexibility was considered favorably.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 39.7 percent and 59.3 percent of the loan volume in the state by number and 90.0 and 5.5 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.8 percent of the loan volume in the state by number and 0.05 percent loan volume by dollar.

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-Tacoma CSA	46,506	69,100	407	190	116,203	81.7	92.9
Spokane-Spokane Valley MSA	2,983	5,796	119	1	8,899	6.3	2.3
Bellingham MSA	1,720	2,544	70	2	4,336	3.0	1.0
Kennewick-Richland-Walla Walla CSA	1,679	2,401	121	0	4,201	3.0	1.0
Wenatchee MSA	806	771	42	0	1,619	1.1	0.4
Yakima MSA	925	1,141	99	0	2,165	1.5	0.7
WA Non-Metro AA	1,979	2,604	215	2	4,800	3.4	1.6
Total	56,598	84,357	1,073	195	142,223	100.0	100.0

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

Dollar Volume of Loans* ('000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Seattle-Tacoma CSA	21,556,709	1,224,767	4,619	1,109,493	23,895,587	90.3	92.9
Spokane-Spokane Valley MSA	572,286	89,760	1,092	10,000	673,138	2.6	2.3
Bellingham MSA	541,239	41,012	789	3,820	586,860	2.3	1.0
Kennewick-Richland-Walla Walla CSA	325,498	46,729	1,608	0	373,835	1.4	1.0
Wenatchee MSA	225,204	11,390	466	0	237,060	0.9	0.4
Yakima MSA	153,074	18,932	1,178	0	173,184	0.7	0.7
WA Non-Metro AA	421,624	32,912	2,367	23,235	480,138	1.8	1.6
Total	23,795,634	1,465,502	12,119	1,146,548	26,419,802	100.0	100.0

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

Seattle CSA

As of June 30, 2019, Chase ranked third in deposits out of 57 institutions with 12.6 percent market share.

In overall home mortgage lending, Chase ranked third out of 660 lenders with a 4.1 percent market share. The two lenders ranked first and second in the market are respectively Boeing Employees Credit Union (9.15 percent) and Wells Fargo (7.7 percent).

In small loans to businesses, Chase ranked second out of 153 lenders with 15.6 percent market share. Other major lenders are Bank of America, N.A. (19.0 percent), and American Express National Bank (14.5 percent).

In small loans to farms, Chase ranked second out of 23 lenders with a 20.6 percent market share. The other major lenders and respective market shares are Bank of America, N.A. (26.9 percent), U.S. Bank, N.A. (15.9 percent), and Wells Fargo Bank, N.A. (13.4 percent).

Spokane MSA

As of June 30, 2019, Chase ranked fifth in deposits out of 17 institutions with 8.9 percent market share.

In overall home mortgage lending, Chase ranked tenth out of 390 lenders with a 2.4 percent market share. Other lenders are Spokane Teachers (8.8 percent), Numerica Credit Union (5.8 percent), and Wells Fargo Bank, N.A. (5.6 percent).

In small loans to businesses, Chase ranked first out of 69 lenders with 15.6 percent market share. Other major lenders are Citibank, N.A. (11.8 percent), American Express National Bank (11.6 percent), U.S. Bank, N.A. (10.7 percent), and Bank of America, N.A. (10.3 percent).

In small loans to farms, Chase ranked second out of 13 lenders with a 15.0 percent market share. The other major lenders and respective market shares are Wells Fargo Bank, N.A. (17.4 percent), U.S. Bank, N.A. (14.6 percent), and John Deere Financial, F.S.B. (12.7).

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AAs.

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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is good. The following information was taken into consideration when determining this rating.

Seattle CSA

- In determining overall performance, examiners considered the limited proportion of OOU's (2.2 percent) in low-income areas and overall level of competition.
- Between 2017 and 2019, the proportion of loans in low-income areas met the percentage of owner-occupied units and was near to the aggregate distribution of loans. The proportion of loans in

moderate-income areas was near to the percentage of owner-occupied units and was below the aggregate distribution of loans.

- Inconsistent and weaker performance in low- and moderate-income geographies between the 2014 and 2016 time periods affected overall conclusions. The proportion of loans in low-income areas was near to the percentage of owner-occupied units and below the aggregate distribution of loans. The proportion of loans in moderate-income areas was below both the percentage of owner-occupied units and the aggregate distribution of loans.

Spokane MSA

- Examiners considered the limited proportion of low-income geographies (0.9 percent) and volume of OOU's (0.6 percent), which constrained lending opportunities.
- Between 2017 and 2019, the proportion of loans in low-income areas exceeded the percentage of owner-occupied units and was well below the aggregate distribution of loans. The proportion of loans in moderate-income areas was near to the percentage of owner-occupied units and was below the aggregate distribution of loans.
- Inconsistent and weaker performance in low-income geographies during the 2014 and 2016 time periods affected aggregated conclusions. The proportion of loans in low-income areas was below the percentage of owner-occupied units and the aggregate distribution of loans. The proportion of loans in moderate-income areas was near to both the percentage of owner-occupied units and the aggregate distribution of loans.

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.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

Seattle CSA

- The small proportion of low-income geographies, volume of businesses in low-income geographies (5.1 percent), and level of competition constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was below the proportion of businesses and well below the aggregate distribution, while the proportion

of small loans to businesses in moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.

- During 2014 to 2016, the bank's performance was stronger, particularly in low-income geographies, and positively affected aggregated conclusions. The proportion of small loans to businesses in low-income geographies was near to the proportion of businesses and exceeded the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.

Spokane MSA

- The small proportion of low-income geographies, volume of businesses in low-income geographies (2.9 percent), and level of competition constrained lending opportunities to existing businesses. Therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of businesses in those geographies.
- Performance against the aggregate distribution of lenders was also given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA. The economic data particularly indicates the high cost of doing business and limited labor force as challenges for businesses.
- Between 2017 and 2019, the proportion of small loans to businesses in low- and moderate-income geographies was below the proportion of businesses and near to the aggregate distribution.
- During 2014 to 2016, the bank's performance was stronger in moderate-income geographies, and positively affected aggregated conclusions. The proportion of small loans to businesses in low-income geographies was below the proportion of businesses and near to the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies near to the proportion of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is adequate. The following information was taken into consideration when determining this rating.

Seattle CSA

- The limited number of farms in low-income geographies, (2.9 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.

- Between 2017 and 2019, the proportion of loans to small farms in low-income geographies was well below the proportion of farms in those geographies and the aggregate distribution of all lenders. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms in those geographies and below the aggregate distribution of all lenders.
- During the 2014 to 2016 period, the proportion of loans to small farms in low-income geographies exceeded both the proportion of farms in those geographies and the aggregate distribution. The proportion of loans to small farms in moderate-income geographies was well below both the proportion of farms in those geographies and the aggregate distribution.

Spokane MSA

- The limited percentage of farms in low-income geographies, (0.6 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no small farm loans in low-income geographies. The proportion of loans to small farms in moderate-income geographies exceeded the proportion of farms and the aggregate distribution.
- During the 2014 to 2016 period, the bank made no farm loans in low- or moderate-income geographies during the period.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits good 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.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Seattle CSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.

- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans was below the proportion of moderate-income families and near to the aggregate distribution.
- During 2014 to 2016, the bank's performance was stronger in lending to low-income borrowers than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and the aggregate distribution.

Spokane MSA

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the bank's performance in lending to low-income borrowers was stronger than performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution.

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.

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Seattle CSA

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Spokane MSA

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is excellent. The following information was taken into consideration when determining this rating.

Seattle CSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.

Spokane MSA

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to farms with revenues of \$1 million or less was near to the percentage of farms and significantly exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was consistent with performance between 2017 and 2019. The bank's percentage of loans to farms with revenues of \$1 million or less was below the percentage of farms and significantly exceeded the aggregate distribution.

Community Development Lending

Seattle- CSA

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.

The bank made 13 CD loans totaling \$1.1 billion. This represents 28.7 percent of the tier 1 capital allocated to the AA. The majority (or 64.8 percent) of CD loans were for affordable housing purposes, which is a critical need in this AA.

Examples of CD loans in the AA include:

- The bank originated a \$100,000 line of credit to a not-for-profit organization that creates and operates social enterprise businesses designed to provide jobs and internships for homeless and at-risk families residing in low-income housing in Snohomish County and Camano Island, Washington. The organization partners with the community colleges and the Workforce Development Council, allowing residents to get college credits and degree certificates. Through 12-week paid internships, the organization enables participants to gain career ladder employment and wage progression.
- The bank originated a \$99.0 million loan for a multi-phase construction project for a building that continues the transformation of the South Lake Union community in Seattle, WA. The project is located in a low-income census tract and established over 5,000 new jobs.
- The bank provided an \$11.6 million loan to help preserve the availability of affordable housing on a multifamily property. This property is comprised of 179 units, of which 178 are affordable to low- and moderate-income households and is located in a moderate-income census tract in Tukwila, WA.
- The bank funded a \$58.0 million loan to develop three multifamily structures in three separate moderate-income census tracts in Seattle, WA. The projects will result in 363 units for low- and moderate-income individuals and families in the AA.

Spokane MSA

The bank 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.

The bank made one CD loan totaling \$10.0 million. This represents 10.5 percent of the tier 1 capital allocated to the AA. The bank originated a \$10.0 million loan to finance the redevelopment of the historic Ridpath Hotel into an apartment complex. The redevelopment consisted of 206 housing units, with 179 units available individuals and families earning up to 60 percent of the AMI. The City of Spokane's City Council supported the project and has indicated the need for more affordable housing.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs in each of the full-scope areas. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

Seattle CSA

A total of 7,369 loans were funded totaling \$1.8 billion under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	975	294,411
FHA	1,119	288,803
HARP	1,935	332,688
VA	1,357	412,838
SBA	255	89,123
USDA	1,728	352,915

Spokane CSA

As outlined below, a total of 821 loans were funded totaling \$132.7 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	102	16,658
FHA	215	29,713
HARP	203	25,020
VA	206	45,843
SBA	9	789
USDA	86	14,695

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Bellingham MSA is consistent with the bank's overall performance in the full-scope areas. Lending performance in the Kennewick-Richland-Walla Walla CSA, Wenatchee MSA, Yakima MSA, and WA Non-Metro AA is weaker than the bank's performance under the Lending Test in the full-scope areas. Weaker performance is due to weaker geographic or borrower income distributions or lack of CD loans. Performance in the limited-scope areas did not impact the Lending Test rating for the state of Washington.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Washington is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Seattle CSA and the Spokane MSA is excellent.

Seattle CSA

The bank 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 current and prior period investments dollar volume represents 8.3 percent of tier 1 capital allocated to the AA. A significant majority, or 85.3 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including affordable housing, community services, and revitalize/stabilize for low- and moderate-income individuals and geographies. Ninety-nine percent of the bank's current period CD investments focused on affordable housing. Additionally, the bank provided 120 current period grants totaling \$16.5 million to a variety of organizations that primarily provide community service needs. All prior period investments support affordable housing. In total, the bank's investments helped create or retain 11,704 low- and moderate-income affordable housing units.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Thirteen current period qualified investments, consisting of 12 Direct Investment LIHTC transactions, were complex. Fourteen current period CD investments and grants serve as catalysts as part of a local government plan for revitalization or stabilization to encourage further growth or improvements. In addition, the bank showed leadership with two investments made under the bank's New Skills at Work initiative. All seven complex prior period investments are Direct Investment LIHTC transactions.

Examples of CD investments in the AA include:

- The bank originated a \$17.3 million Direct Investment LIHTC transaction to an organization to provide 85 rental units to low- and moderate-income individuals and families in the AA.
- The bank originated a \$21.9 million Direct Investment LIHTC investment to provide 254 affordable rental housing units to low- and moderate-income individuals and families in the AA.
- The bank originated two NMTC equity investments totaling \$3.0 million with a hotel apartment organization. This organization is responsive to the Seattle Comprehensive Plan by renovating a vacant building and creating diverse housing opportunities along with retail and commercial use. This will also meet this low-income neighborhood's need for new market rate units and affordable residential units, which are in short supply. This project targets local businesses to return back to the building. This will help initiate additional investment and revitalization in this AA as well as help retain residents by providing much needed goods, services, and housing.

- The bank made two grants totaling \$500,000 to a community service organization that has been helping low- and moderate-income individuals transform their lives of poverty, homelessness, and hunger, through food for approximately 30 years. This organization addresses persistent poverty and economic mobility through advanced skill job training to low- and moderate-income individuals. The main goal and outcome of the Foodservice Apprenticeship Program is that graduates will increase their wages 25 percent. Participants in the program get practical work experience while giving back to their community.

Spokane MSA

The bank has an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The current and prior period investments dollar volume represents 70.2 percent of tier 1 capital allocated to the AA. A significant majority, or 85.7 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to the needs identified in this AA including affordable housing and community services for low- and moderate-income individuals and geographies. All of the bank's current period CD investments focused on affordable housing. The bank also provided 10 current period grants totaling \$1.1 million to a variety of organizations that support community service needs, and one totaling \$25,000 supporting affordable housing. All prior period investments are related to LIHTC transactions that support affordable housing. Overall, the bank's investments helped create 542 low- and moderate-income affordable housing units.

The bank makes occasional use of innovative and/or complex investments to support CD initiatives. The bank made six current and prior period CD investments consisting of Direct Investment LIHTC transactions.

Examples of CD investments in the AA include:

- The bank made a \$24.3 million Direct Investment LIHTC transaction to provide 379 rental units to low- and moderate-income individuals and families in the AA.
- The bank provided a \$13.0 million LIHTC investment to fund a housing project that provided 119 units for low- and moderate-income households. All rental units funded by LIHTC funds are set aside for low- and moderate-income households. To qualify for these units, earnings are capped at between 50-60 percent of the AMI.
- The bank made five grants totaling \$625,000 to a nonprofit community organization. The mission of this nonprofit is to fight poverty and unemployment with critical insights, researched guidance, innovative funding, and strategic partnership.

Qualified Investments – State of Washington										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Seattle-Tacoma CSA	70	47,290	163	275,364	233	73.5	322,655	71.6	0	0
Spokane-Spokane Valley MSA	11	9,550	20	57,224	31	9.8	66,774	14.8	0	0
Limited Review:										
Bellingham MSA	4	4,503	5	15,889	9	2.8	20,392	4.5	0	0
Kennewick-Richland-Walla Walla CSA	4	118	1	654	5	1.6	773	0.2	0	0
Wenatchee MSA	1	45	0	0	1	0.3	45	0.0	0	0
Yakima MSA	3	5,617	8	19,050	11	3.5	24,666	5.5	0	0
WA Non-Metro AA	4	2,290	5	5,051	9	2.8	7,341	1.6	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	17	7,939	17	5.4	7,939	1.8	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	1	10	0	0	1	0.3	10	0.0	0	0

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

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

Statewide Investments in State of Washington

The bank has qualified investments with and without P/M/F to serve AAs in the state of Washington. These CD investments support community services, with one supporting affordable housing. The investment represents 0.6 percent of total state investments. The level of investments did not impact the overall Investment Test rating for the state of Washington.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not change the initial overall conclusions based on the AAs receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Bellingham MSA, the Yakima MSA, and the WA Non-Metro AAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas. The bank's performance in the Wenatchee MSA and the Kennewick-Richland-Walla Walla CSA are weaker than the bank's overall performance under the Investment Test in the full-scope area, due primarily to a lower volume of CD investments.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Seattle CSA is excellent and the bank's performance in the Spokane MSA is adequate. More weight was given to the Seattle-Tacoma CSA due to the bank's larger deposit base and branch presence.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's full-scope AAs.

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Seattle CSA

Based on the data in the table below and performance context, the branch distribution is excellent. In low- and moderate-income geographies, the distribution exceeds the percentage of the population. The bank had nine branches in low-income geographies and 43 branches in moderate-income geographies. The distribution was augmented by 14 MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branches and confirmed they were serving the adjacent low- and moderate-income populations.

Spokane MSA

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively well below and exceeds the percentage of the population. The bank had no branches in low-income geographies and six branches in moderate-income geographies. More weight was given to the distribution in moderate-income geographies due to the small portion (0.6 percent) of the population residing in low-income geographies.

Distribution of Branch Delivery System								As of December 31, 2019			
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Seattle-Tacoma CSA	92.9	141	77.9	6.4	30.5	45.6	27.6	4.8	21.8	45.6	27.6
Spokane-Spokane Valley MSA	2.3	12	6.6	0	50.0	16.7	33.3	0.6	27.0	45.2	26.4

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

Seattle CSA

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over

the evaluation period. This included review of the bank's 261 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 53.1 percent over the prior rating period to 23 (8.8 percent) deposit-taking ATMs in low-income geographies and 75 (28.7 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Spokane MSA

Alternative delivery systems did not significantly enhance the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 17 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank decreased the deposit-taking ATMs in low- and moderate-income geographies by 10.0 percent from the prior rating period to no deposit-taking ATMs in low-income geographies and nine (52.9 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed decreases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Seattle-Tacoma CSA	3	9	-2	0	-5	+1
Spokane-Spokane Valley MSA	0	2	0	0	-2	0

Seattle CSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed two branches in low-income geographies and opened one branch and closed one branch in moderate-income geographies. Branch closures were due to reduced customer usage and unprofitability. Despite the branch closures, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Spokane MSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in low- and moderate-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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 1:00 pm.

All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development ServicesSeattle CSA

The bank provided an excellent level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 853 qualified CD service activities to 35 organizations for a total of over 3,510 hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were responsive to the community needs in the AA, particularly affordable housing, and greater access to banking services. The following are examples of CD services provided in this AA:

- The bank provided more than 115 homebuyer workshops and seminars for more than 515 hours, impacting approximately 833 low- and moderate-income individuals.
- A bank employee provided technical assistance for low- and moderate-income individuals, in coordination with nonprofits that served the low- and moderate-income communities. The assistance provided education on safe, low-cost alternatives to traditional checking accounts and options to avoid high cost financial products such as payday loans and check cashers and provided standards for alternative products that are safe, low cost options for underbanked and unbanked individuals and families, and for those who are reentering the banking system.

Spokane MSA

The bank provided an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 77 qualified CD service activities to seven organizations for a total of over 335 hours of service. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services were responsive to the community needs in the AA, focus on homeownership for low- and moderate-income individuals. The following are examples of CD services provided in this AA:

- The bank provided 43 individual pre-purchase homebuyer education for more than 168 hours, impacting approximately 42 low- and moderate-income individuals.

- A bank employee provided 140 hours of technical assistance benefiting 412 low- and moderate-income individuals. The assistance provided education to first-time homebuyer clients interested in homeownership. The employee explained the mortgage process and provided information on mortgage products, services, and programs targeting low- and moderate-income homebuyers.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the Wenatchee MSA and Yakima MSA is consistent with the bank's overall performance under the Service Test in the full-scope area and the bank's performance under the Service Test in the Bellingham MSA, Kennewick-Richland-Walla Walla MSA, and WA Non-Metro AA is weaker than the bank's overall performance under the Service Test in the full-scope areas due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of West Virginia

CRA rating for the State of West Virginia²⁹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- A good level of lending activity.
- A good geographic distribution of home mortgage loans and small loans to businesses.
- An excellent borrower distribution of home mortgage loans and small loans to businesses.
- An adequate level of CD loans that has a neutral effect on the rating.
- The extensive use of flexible products that positively affected the rating.
- A good level of qualified investments that demonstrated excellent responsiveness to credit and community economic development needs.
- A high level of statewide investments enhanced the overall rating.
- Retail service delivery systems that are reasonably accessible to geographies and individuals of different income levels.
- An adequate level of CD services that were responsive to AA needs.

Description of Institution's Operations in West Virginia

The state of West Virginia is Chase's 25th rating area based on its total deposits of \$1.7 billion, representing 0.1 percent of the bank's total deposits. As of December 31, 2019, the bank operated 18 branches and 39 deposit-taking ATMs within the rating area, representing 0.3 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$533.5 million in loans or 0.1 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data as of June 30, 2019, there were 71 institutions operating 608 offices in the state of West Virginia. Chase ranked 6th in deposit market share with 5.4 percent. Major competitors in the state include Branch Banking and Trust Company with 15.4 percent market share; United Bank with 14 percent market share; and WesBanco Bank with 8.5 percent market share.

The bank delineated three AAs in the state of West Virginia. The Charleston-Huntington-Ashland CSA (Charleston CSA) accounted for 59.5 percent of the bank's deposits in the state of West Virginia and received a full-scope review. The Beckley MSA and West Virginia Non-Metro AA received limited-scope reviews. The delineated AAs are described in appendix A.

²⁹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AAs

The Charleston CSA consists of the Charleston MSA and Huntington-Ashland MSA. The bank defines its assessment area as the entire Charleston MSA and the Cabell, Putnam, and Wayne counties of the Huntington-Ashland MSA.

According to FDIC Deposit Market Share, as of June 30, 2019, there were 33 institutions operating 193 offices in this area. The bank-maintains deposits of \$1.02 billion in the CSA, ranking it fifth in deposit market share. As of December 31, 2019, the bank operated ten branches and 21 deposit-taking ATMs in the AA, representing 0.2 percent of bank branches and 0.1 percent of deposit-taking ATMs in the area.

The following table provides a summary of the demographics that includes housing and business information for the Charleston CSA. Table A indicates that the volume of OOUs is small in low-income census tracts (1.8 percent) and over 22.0 percent of families in the AA are low-income. The Charleston CSA's cost of housing also limits access to affordable homeownership among low-income borrowers. The median housing value in the Charleston CSA is two times the median income, two to three times the moderate-income, and four times the low-income, indicating a large proportion of OOUs are not affordable to low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Charleston CSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 percent down payment, and not accounting homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$27,310 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$78,961 mortgage with a payment of \$819 per month; a moderate-income borrower earning \$43,697 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$157,040 mortgage with a payment of \$1,311 per month.

Median rents and the percentage of families below poverty level suggest rental housing is also unaffordable for many low-income residents.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 170 Charleston-Huntington-Ashland WV-OH-KY CSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	125	5.6	22.4	47.2	24.0	0.8
Population by Geography	469,657	3.3	16.6	52.8	26.7	0.6
Housing Units by Geography	220,505	4.2	17.4	52.5	25.7	0.3
Owner-Occupied Units by Geography	137,364	1.8	15.1	54.3	28.8	0.0
Occupied Rental Units by Geography	55,376	8.5	20.2	48.0	22.5	0.9
Vacant Units by Geography	27,765	7.4	23.0	52.4	16.9	0.3
Businesses by Geography	25,550	7.3	11.4	52.0	28.9	0.3
Farms by Geography	574	3.1	11.5	56.4	28.9	0.0
Family Distribution by Income Level	123,055	22.0	17.2	19.2	41.6	0.0
Household Distribution by Income Level	192,740	25.6	15.5	16.9	42.0	0.0

Median Family Income MSA - 16620 Charleston, WV MSA	\$54,658	Median Housing Value	\$109,680
Median Family Income MSA - 26580 Huntington-Ashland, WV MSA	\$54,584	Median Gross Rent	\$651
		Families Below Poverty Level	13.1%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

According to the Moody's Analytics December 2019 report, the strengths of the Charleston, WV area include a low cost of living, low business costs and below average employment volatility. However, it is experiencing a rapid decline in population, below average incomes, low quality of life, high poverty rates and a high share of surface mines which produce lower quality coal. Charleston is one of the most coal dependent metro areas in the nation. The area struggles to overcome a declining coal industry. It is among the worst-performing metro areas. There is a growing over-65 population. However, it is a less healthy population with a high death rate that is tied to poor health. Economic drivers are energy and resources, healthcare, and state government. Major employment sectors include government, education and health services and professional and business services. In addition to federal, state, and local government, major employers in the area include Charleston Area Medical Center, Herbert J. Thomas Memorial Hospital Association, FronTier Communications, Walmart, and MC Junking Corp. are also significant employers.

Community Contacts

Four community contacts completed during the examination period were reviewed to gain an understanding of the needs in the community. Contacts were completed with organizations focused on affordable housing and economic development/small business. Contacts noted that there are several poverty related issues that need to be addressed including dental and vision care; medical care/prescription assistance; and assistance with basic day to day needs such as utilities, food, and clothing. The population in the area is aging and the number of elder rental households is increasing. There is high demand for affordable rental housing units including a growing need for affordable elder housing. There is also a need for support for programs that support asset development and self-sufficiency among low-income households. There are only a small number of institutions that operate in Kanawha County so there is a need for traditional banking services. It was reported by a community contact that the economic conditions vary widely throughout Kanawha and Putnam counties with some individuals living in severe poverty while others are affluent individuals. However, the majority of the area is severely depressed. The level of development in the counties also vary from extremely rural to urban. The exodus of major employers (coal mining companies) has left some the rural areas with a significant employment gap as many residents refuse to relocate to areas with more job opportunities. Eastern Kanawha County has been impacted the most over the last 6-7 years by the departure of key employers. In Ashland, a new manufacturing facility is built, which will bring approximately 700-800 well-paying jobs. This will help reverse the decline in jobs that had been occurring over the past few years due to the decline of the coal industry. For housing, more of the focus seems to be on new construction. However, bank financing for rehab of some of the older housing stock as many housing units are substandard and in need of refurbishing or removal is also necessary. Other needs mentioned for the area include:

- Workforce development
- Affordable home loans for low- and moderate-income individuals
- Small business incubators
- Technical assistance for small businesses
- Funding for programs to combat the opioid addiction epidemic

Scope of Evaluation in West Virginia

The Charleston CSA received a full-scope review. The CSA accounts for 59.5 percent of deposits in the state of West Virginia. The remaining AAs in the state of West Virginia received limited-scope reviews. Performance in the limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in the state of West Virginia is rated High Satisfactory.

Conclusions for Areas Receiving a Full-Scope Review

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

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall High Satisfactory Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Lending Activity

Lending levels reflect good responsiveness to credit needs in the bank's AAs.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 41.0 percent and 58.4 percent of the loan volume in the state by number and 61.4 and 38.0 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 0.6 percent of the loan volume in the state by number and 0.06 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston-Huntington-Ashland CSA	1,886	2,707	29	2	4,624	65.6	59.5
Beckley MSA	485	706	9	0	1,200	17.0	16.0
WV Non-Metro AA	518	705	2	0	1,225	17.4	24.5
Total	2,889	4,118	40	2	7,049	100	100.0

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

Dollar Volume of Loans* (\$000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston Huntington-Ashland CSA	206,877	149,023	238	4,550	360,688	67.6	59.5
Beckley MSA	53,192	29,258	64	0	82,514	15.5	16.0
WV Non-Metro AA	65,928	24,368	14	0	90,310	16.9	24.5
Total	325,997	202,649	316	4,550	533,512	100.0	100.0

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

Chase ranked fourth in deposits out of 51 institutions with 7.2 percent market share.

In overall home mortgage lending, Chase ranked seventh with 3.7 percent market share. The top three lenders in the market are City National Bank of West Virginia (11.4 percent), Quicken Loans, Inc. (6.0 percent), and The Huntington National Bank (6.0 percent).

In small loans to businesses, Chase ranked third out of 76 lenders with a 10.0 percent market share. Other major lenders are Branch Banking and Trust Co., (16.0 percent), American Express National Bank (15.4 percent), and Synchrony Bank (7.5 percent).

In small loans to farms, Chase ranked first out of nine lenders with a 25.0 percent market share. The other major lenders and respective market shares are U.S. Bank, N.A. (25.0 percent), John Deere Financial, F.S.B. (12.5 percent), and Summit Community Bank, N.A. (14.1 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases is adequate. The following information was taken into consideration when determining this rating.

- The limited proportion of housing units in low-income geographies, particularly OOUs (1.8 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given more consideration due to the higher percentage of OOUs in those geographies.

- The level of competition in the AA was also considered.
- Between 2017 and 2019, the proportion of loans in low-income areas was well below the percentage of owner-occupied units and the aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and exceeded the aggregate distribution of loans.
- During 2014 through 2016, performance in low-income geographies was below the percentage of owner-occupied units and exceeded the aggregate distribution of loans, while performance in moderate-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the table and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies exceeded both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and near to the aggregate distribution
- During 2014 to 2016, the bank's proportion of small loans to businesses in low- and moderate-income geographies was near to the proportion of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of West Virginia 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is good. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies, (3.1 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.

- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was well below the proportion of farms and the aggregate distribution.
- During 2014 to 2016, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies significantly exceeded the proportion of farms in those geographies and the aggregate distribution.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

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 West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners also particularly considered housing affordability challenges for low-income borrowers and placed slightly more weight on lending to moderate-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans met the proportion of moderate-income families and exceeded the aggregate distribution.
- During 2014 to 2016 the bank's performance was consistent with performance between 2017 to 2019. The proportion of loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of lenders. The proportion of moderate-income loans exceeded both the proportion of moderate-income families and the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was slightly weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T in the state of West Virginia 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution of lenders as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank has made an adequate level of CD loans.

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

The bank originated or purchased two CD loans totaling \$4.6 million, which represents 3.5 percent of the tier 1 capital allocated to the AA. Both loans were for affordable housing purposes, which is a need in the AA.

Examples of CD loans in the AA include:

- The bank funded a \$440,000 term loan to finance a portion of a public housing project located in a moderate-income census tract in Charleston, WV. The redevelopment project began in 2011 and upon completion, created 66 affordable housing units. Thirty-six units are for the elderly and disabled and the remaining are family units.
- The bank funded a \$4.1 million loan for the construction of Section 8 housing in Kanawha County. This created 24 units of affordable housing in the AA.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to serve AA credit needs. A total of 686 loans were funded totaling nearly \$81.2 million. Refer to the comments in the Product Innovation and Flexibility section in the front of this performance evaluation for program details.

Charleston CSA

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	40	4,617
FHA	216	22,288
HARP	90	9,599
VA	110	17,993
SBA	9	2,682
USDA	221	24,043

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Lending Test in the Beckley MSA and WV Non-Metro AA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of West Virginia is rated Outstanding. A high number of statewide investments enhanced the bank's overall performance under the Investment Test.

Conclusions for Area Receiving a Full-Scope Review

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

The bank 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 current and prior period investments represent 8.8 percent of tier 1 capital allocated to the AA. Sixty-five percent are current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs identified in the AA. Four current period CD investments totaled \$3.2 million with 81.1 percent supporting affordable housing. Eighteen current period grants totaled \$745,000 with 15.2 percent and 3.7 percent focusing on community services and revitalization/stabilization, respectively. All prior period investments support affordable housing. Three investments supporting revitalization/stabilization serve as catalysts to encourage future improvement and growth in the respective areas.

The bank does not use innovative and/or complex investments to support CD initiatives.

Examples of community development investments in the AA include:

- The bank provided four annual grants, totaling \$272,000, to an organization to fund the implementation and operation of its The Road to Self-Sufficiency program. The region the organization serves has an average unemployment rate of 8.8 percent, and approximately 22.1 percent of residents live below the poverty level. The organization, in partnership with the Consumer Credit Counseling Division (CCCD), provides training focusing on industrial certification programs, work adjustment/life skills training, customer service-janitorial-medical technician training, and general office skills. In addition, the CCCD provides financial stability and coaching support.
- The bank provided a \$65,000 grant to an organization for their farm's expansion project located in Kanawha County, WV. The project created at least ten jobs for low-income/unemployed residents by targeting economically disadvantaged, low-income, and unemployed individuals and ex-offenders, for training and employment in the fields of agriculture and culinary arts.
- The bank provided two grants totaling \$120,000 to a local city Foundation for their River to Rail initiative. It targeted a low- and moderate-income area suffering from the spread of crime, slum and blighting conditions, and deterioration of the public infrastructure. Grant funding will be used to make improvements to public spaces, specifically new curb and sidewalk construction, installation of rain gardens, improvements to bicycle routes and facilities, landscaping, benches, and public art.

Qualified Investments – State of West Virginia										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Review:										
Charleston-Huntington-Ashland CSA	21	7,572	22	3,946	43	28.7	11,518	41	0	0
Limited Review:										
Beckley MSA	3	40	1	3	4	2.7	43	0.1	0	0

WV Non-Metro AA	1	243	5	4,957	6	4.0	5,200	18.5	0	0
Statewide Investments with purpose, mandate, or function (P/M/F) to Serve AAs	0	0	17	9,354	17	11.3	9,354	33.3	0	0
Statewide Investment with No purpose, mandate, or function (P/M/F) to Serve AAs	35	9,840	45	18,260	80	53.3	28,101	7.1	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.

Statewide Investments in the State of West Virginia

The bank has 27 current and prior period CD investment and grants with and without a P/M/F to serve AA in the broader statewide area. Ninety-nine percent support affordable housing. These investments represent a high 40 percent of total qualified investments and enhanced the bank's overall performance under the Investment Test in the state of West Virginia.

Conclusions for Area Receiving a Limited-Scope Review

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not change the initial overall conclusions based on the AA receiving a full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the WV Non-Metro AA is strong than the bank's overall performance under the Investment Test in the full-scope area. Stronger performance is due to a high level of investments in relation to allocated tier 1 capital. The bank's performance under the Investment Test in the Beckley MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance is due to a lower level of investments.

SERVICE TEST

The bank's performance under the Service Test in state of West Virginia is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is adequate. In low- and moderate-income geographies, the distribution respectively exceeds and is well below the percentage of the population. The bank had one branch in a low-income geography and no branches in moderate-income geographies. The distribution was augmented by one MUI tract branch that serves moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the MUI branch and confirmed it was serving the adjacent moderate-income population.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Charleston CSA	59.5	10	55.6	10.0	0.0	80.0	10.0	3.5	17.7	50.4	27.8

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 21 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank had four (10.0 percent) deposit-taking ATMs in low-income geographies and no ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Charleston - CSA	0	4	0	-1	-2	-1

The bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branches in the low-income geographies and closed one branch in a moderate-income geography. The branch closure was due to its proximity to another Chase branch in a MUI geography. Data confirmed use of the MUI branch by individuals in the moderate-income geography.

Community Development Services

The bank provided an adequate level of CD services.

Bank records show that employees provided technical assistance and/or job-specific expertise for 57 CD service activities to 17 organizations for a total of over 200 qualified hours of service over a six-year period, benefitting more than 250 low- and moderate-income individuals. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The following are examples of CD services provided in this AA:

- A bank employee provided 72 hours of board service for a not-for-profit micro enterprise development center and business incubator serving a predominately low- and moderate-income client base.

- A bank employee provided a financial literacy seminar for low- and moderate-income individuals, in coordination with a nonprofit that served the low- and moderate-income community. The education received helped equip participants with the knowledge and skills necessary to make good financial decisions, so that they can become self-sufficient and enjoy financial well-being over time.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Low Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the WV Non-Metro AA is stronger than the bank's overall performance under the Service Test in the full-scope area due to stronger branch distribution in low- and moderate-income geographies. The bank's performance in the Beckley MSA is weaker than the bank's overall performance under the Service Test due to weaker branch distribution in low- and moderate-income geographies.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin³⁰: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- An excellent level of lending activity.
- An adequate geographic distribution of home mortgage loans and small loans to businesses.
- A good borrower distribution of home mortgage loans and small loans to businesses.
- An adequate level of CD loans that has a neutral effect on the rating.
- The extensive use of innovative/flexible products, which positively affected the rating.
- An excellent level of qualified CD investment that displayed excellent responsiveness to credit and community economic development needs.
- The extensive use of innovative and/or complex investments.
- A high level of statewide investments.
- Retail service delivery systems that are accessible to geographies and individuals of different income levels.
- A significant level of CD services that were responsive to AA needs.

Description of Institution's Operations in Wisconsin

The state of Wisconsin is Chase's 14th rating area based on its total deposits of \$9.2 billion, representing 0.7 percent of the bank's total deposits. As of December 31, 2019, the bank operated 57 branches and 101 deposit-taking ATMs within the rating area, representing 1.1 percent of total branches and 0.6 percent of total ATMs. The bank originated and purchased approximately \$6.7 billion in loans or 1.0 percent of total bank loan originations and purchases during the evaluation period in the state.

According to FDIC Deposit Market Share Data as of June 30, 2019, there were 225 banks operating 1,919 branches in the state of Wisconsin. Chase ranks fourth in deposit market share with 6.6 percent. Major banking competitors in the state include U.S. Bank, N.A. with 17.3 percent deposit market share; BMO Harris Bank with 14.2 percent deposit market share; and Associated Bank with 11.5 percent deposit market share.

The bank has delineated seven AAs in the state of Wisconsin. The Milwaukee-Waukesha-West Allis MSA (Milwaukee MSA), which accounts for 66.9 percent of the deposits and 50.9 percent of lending in the state, received a full-scope review. The Appleton-Oshkosh-Neenah CSA, Fond du Lac MSA, Green Bay MSA, Madison-Janesville-Beloit CSA, Racine MSA, and WI Non-Metro received limited-scope reviews. The delineated AAs are described in appendix A.

³⁰ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Description of Full-Scope AA

The following table provides a summary of the demographics that includes housing and business information for the Milwaukee MSA. Table A indicates that the volume of OOUs is small in low-income census tracts (7.3 percent) and 23.5 percent of families in the AA are low-income. The Milwaukee MSA's cost of housing also limits access to affordable homeownership among low-income borrowers. The median housing value in the Milwaukee MSA is 2.6 times the median income, 3.2 times the moderate-income, and 5.2 times the low-income, indicating a proportion of OOUs are unaffordable to low-income borrowers. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 36 percent of the applicant's income.

In the Milwaukee MSA, assuming a 30-year mortgage with a 5.0 percent interest rate, 3.0 down payment, and not accounting for homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$35,882 per year (or less than 50 percent of the FFIEC adjusted median family income in the MSA) could afford a \$119,802 mortgage with a payment of \$1,076 per month; a moderate-income borrower earning \$57,411 per year (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$222,420 mortgage with a payment of \$1,722 per month.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 376 Milwaukee-Racine-Waukesha WI MSA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	431	23.0	15.8	32.3	28.3	0.7
Population by Geography	1,570,006	16.7	14.9	33.7	34.7	0.0
Housing Units by Geography	671,468	16.1	15.1	35.4	33.4	0.0
Owner-Occupied Units by Geography	376,569	7.3	11.9	36.2	44.5	0.0
Occupied Rental Units by Geography	247,577	25.6	20.0	36.1	18.3	0.0
Vacant Units by Geography	47,322	35.9	15.3	25.0	23.9	0.0
Businesses by Geography	92,318	10.9	11.9	35.0	42.2	0.0
Farms by Geography	2,088	5.7	7.0	38.2	49.1	0.0
Family Distribution by Income Level	388,209	23.5	16.2	19.4	40.9	0.0
Household Distribution by Income Level	624,146	25.2	15.4	17.0	42.4	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$186,990
			Median Gross Rent			\$841
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Economic Data

According to Moody's Analytics February 2020 Report, the area's strengths include a well-educated workforce; above-average per capita income; and an above-average resilience of manufacturers. Employment increased to finally exceed its prior peak reached in 2000, however the job recovery was

nuanced. Durables manufacturing fell as did professional services. Meanwhile, education/healthcare had strong gains, with additional support from trade. The labor market was weak for most of 2019. As Wisconsin's only large urban hub, Milwaukee is rapidly developing into a medical center. Since 2011, the area's healthcare employment share has grown by 25 percent above Wisconsin's. Aurora Healthcare, Ascension Wisconsin and Froedtert Health, the area's three largest employers, account for more than 5 percent of jobs. Given an above-average age and still-aging state population, demand for medical services is high and Milwaukee relies more on healthcare employment than average, in stark contrast to the rest of Wisconsin. As healthcare jobs pay more than farm and manufacturing jobs, the sector's presence will further cement a sizable 20 percent to 25 percent wage gap with the average Wisconsin metro area. Housing value appreciation in the area has slowed recently.

Community Contacts

Two community contacts completed during the examination period with organizations serving the area were reviewed to ascertain credit and community development needs. Contacts were completed with organizations focused on community and social services for low-income individuals and economic development. Contacts noted that there are major pockets of low-income families and individuals in Milwaukee County. Milwaukee and Ozaukee counties have high levels of income inequality. Many low-income families have difficulty in locating safe and affordable housing due to ongoing deferred maintenance issues with many multi-family dwellings. Contacts identified the following needs in the area:

- Affordable housing
- Financial capability training
- Workforce development
- Small business and entrepreneurship support
- Access to transportation.

Scope of Evaluation in Wisconsin

The Milwaukee MSA, which accounts for 66.9 percent of the bank's deposits in the state of Wisconsin received a full-scope review. The remaining AAs in the state of Wisconsin received limited-scope reviews. Performance in limited-scope AAs and its effect on the CRA rating are discussed at the end of each test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WISCONSIN

LENDING TEST

The bank's performance under the Lending Test in the state of Wisconsin is rated High Satisfactory.

Performance in AAs receiving limited-scope reviews was factored together with performance from AAs receiving full-scope reviews to determine the state's overall Outstanding Lending Test rating. Limited-scope conclusions did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Milwaukee MSA is good. Overall excellent lending levels, and good borrower distribution, off-set weaker but adequate geographic distribution of loans. The low level of CD lending had a neutral effect on the rating. Product innovation and flexibility was considered favorably.

Lending Activity

Lending levels reflect excellent responsiveness to credit needs in the AA.

Examiners considered the number and amount of home mortgage, small business, and small farm loans originated or purchased relative to Chase's capacity based on deposits, competition, and market presence. Lending activity for home mortgage and small loans to businesses received the most weight in reaching conclusions. Respectively, home mortgage lending and small loans to businesses account for 34.6 percent and 64.2 percent of the loan volume in the state by number and 84.1 and 14.8 percent of loan volume by dollar. Small farm lending is not a strategic focus of the bank and received minimal weight in reaching conclusions. Farm loans represented 1.1 percent of the loan volume in the state by number and 0.42 percent loan volume by dollar.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Milwaukee-Waukesha-Racine MSA	13,866	23,060	133	14	37,073	50.9	66.9
Appleton-Oshkosh-Neenah CSA	1,818	4,386	115	0	6,319	8.7	6.9
Fond du Lac MSA	385	926	56	0	1,367	1.9	0.9
Green Bay MSA	1,401	2,671	38	1	4,111	5.6	4.3
Madison-Janesville-Beloit CSA	3,621	8,881	180	4	12,686	17.4	13.3
Racine MSA	1,331	2,418	23	0	3,772	5.2	2.6
WI Non-Metro AA	2,798	4,448	224	2	7,472	10.3	5.1
Total	25,220	46,790	769	21	72,800	100.0	100.0

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

Dollar Volume of Loans* (\$000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Milwaukee Waukesha-Racine MSA	3,389,530	494,500	1,506	23,595	3,909,131	58.7	66.9
Appleton-Oshkosh-Neenah CSA	288,054	91,706	3,111	-	382,871	5.8	6.9
Fond du Lac MSA	56,329	15,914	492	-	72,735	1.1	0.9
Green Bay MSA	228,651	60,306	606	10,000	299,563	4.5	4.3
Madison-Janesville-Beloit CSA	840,989	156,975	13,784	3,220	1,014,968	15.2	13.3
Racine MSA	217,174	58,353	147	-	275,674	4.1	2.6
WI Non-Metro AA	581,283	107,630	8,744	4,400	702,057	10.6	5.1
Total	5,602,010	985,384	28,390	41,215	6,656,999	100.0	100.0

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

Chase ranked third in deposits out of 46 financial institutions with a 9.8 percent market share.

In overall home mortgage lending, Chase ranked third out of 537 lenders with a 5.2 percent market share. The market is highly competitive. Other major lenders are Landmark Credit Union (10.9 percent), Wells Fargo Bank, N.A. (7.1 percent), and Associated Bank (4.7 percent).

In small loans to businesses, Chase ranked first out of 112 lenders with 18.5 percent market share. Other major lenders are U.S. Bank, N.A. (11.3 percent), State Bank of the Lakes (6.9 percent), and Town Bank (6.9 percent).

In small loans to farms, Chase ranked third out of 20 lenders with a 15.5 percent market share. The other major lenders and respective market shares are U.S. Bank, N.A. (31.6 percent), John Deere Financial, F.S.B. (20.1 percent), and BMO Harris Bank, N.A. (9.8 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- The smaller proportion of housing units in low-income geographies, particularly OOUs (7.3 percent), constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher percentage of OOUs in those geographies.
- The high level of competition in the AA (537 home mortgage lenders) was also considered and examiners placed greater significance on performance compared to the aggregate of lenders.
- Between 2017 and 2019, the proportion of loans in low-income areas were well below the percentage of owner-occupied units and the aggregate distribution of loans. In moderate-income areas the proportion of loans was below the percentage of owner-occupied units and aggregate distribution of loans.
- During 2014 through 2016, performance in low- and moderate-income geographies was well below both the percentage of owner-occupied units and aggregate distribution of loans, while performance in moderate-income geographies was well below the percentage of owner-occupied units and below the aggregate distribution of loans.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Performance against the aggregate distribution of lenders was given additional consideration as it reflects the difficulties all lenders are experiencing due to the economic constraints discussed above under the Description of the Full-Scope AA.
- Between 2017 and 2019, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was below both the proportion of businesses and the aggregate distribution.
- During 2014 to 2016, the proportion of small loans to businesses in low-income geographies was well below both the proportion of businesses and the aggregate distribution, while the proportion of small loans to businesses in moderate-income geographies was well below both the proportion of businesses and the aggregate distribution.

Small Loans to Farms

Refer to Table S in the state of Wisconsin 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 farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms is excellent. The following information was taken into consideration when determining this rating.

- The limited number of farms in low-income geographies (5.7 percent) constrained lending opportunities; therefore, performance in moderate-income geographies was given slightly more consideration due to the higher number of farms in those geographies.
- The fact that farm lending is not a focus of the bank was also considered.
- Between 2017 and 2019, the bank made no loans to small farms in low-income geographies. The proportion of loans to small farms in moderate-income geographies was near to the proportion of farms in those geographies and significantly exceeded the aggregate distribution of all lenders.
- During 2014 to 2016, performance in low-income geographies was stronger than performance during the 2017 to 2019 period. The proportion of loans to small farms in low-income geographies significantly exceeded both the proportion of farms and the aggregate distribution. In moderate-income geographies, performance was below the proportion of farms in those geographies and significantly exceeded the aggregate distribution for the respective geographies.

Lending Gap Analysis

A review of home mortgage loans, small loans to business, and small loans to farms including summary reports and AA maps did not identify any unexplained conspicuous lending gaps in the bank's activities.

Distribution of Loans by Income Level of the Borrower

The bank exhibits good 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 Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Greater significance was placed on performance against the aggregate distribution as it reflects the difficulties all lenders are experiencing due to competition and the economic constraints discussed above under the Description of this Full-Scope AA.
- Examiners particularly considered housing affordability challenges for low-income borrowers.
- Between 2017 and 2019, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and the aggregate distribution.
- During 2014 to 2016, the proportion of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate distribution of lenders. The proportion of moderate-income loans met the proportion of moderate-income families and was below the aggregate distribution.

Small Loans to Businesses

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

Based on the data in the tables and the following factors, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was weaker than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was well below the percentage of businesses and exceeded the aggregate distribution.

Small Loans to Farms

Refer to Table T 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 farms.

Based on the data in the table and the following considerations, the distribution of the bank's originations and purchases of small loans to farms by revenue category is good. The following information was taken into consideration when determining this rating.

- The fact that farm lending is not a focus of the bank was considered.
- Between 2017 and 2019, the bank's percentage of loans to businesses with revenues of \$1 million or less was below the percentage of businesses and exceeded the aggregate distribution.
- During 2014 to 2016, the bank's performance was stronger than performance between 2017 and 2019. The bank's percentage of loans to businesses with revenues of \$1 million or less was near to the percentage of businesses and exceeded the aggregate distribution.

Community Development Lending

The bank has made a low 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.

The bank originated or purchased 14 CD loans totaling \$23.6 million, which represents less than 3 percent of the tier 1 capital allocated to the AA. The majority of the loans were for community service purposes, which is a need in the AA.

Examples of CD loans in the AA include:

- The bank funded a \$1.0 million loan to the School District of Cudahy to continue its efforts to offer quality education to low- and moderate-income students. The district, which serves 2,500 students, comprises five elementary schools, two middle schools, and one high school. Over 50.0 percent of the students are eligible for the free and reduced lunch program.
- The bank funded a \$668,500 loan to replace an existing library and it created additional housing in downtown Milwaukee, WI. The project is located in a low-income census tract and added 11 low-income units of affordable housing. The renovation was deemed vital to spur economic growth in the downtown neighborhood.
- The bank originated a \$7.0 million loan to expand an academy that focuses on at-risk children in the city of Milwaukee to offer academic, social, emotional, and spiritual tools. The organization's mission is to serve men, women, and children who are homeless, hungry, or poor in the city of Milwaukee.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. A total of 2,512 loans were funded totaling nearly \$414.8 million. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000's)
DreaMaker	550	86,020
FHA	901	135,878
HARP	380	48,663
VA	454	99,066
SBA	66	16,436
USDA	161	28,778

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Lending Test rating and did not significantly affect the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, performance under the Lending Test in the Appleton-Oshkosh-Neenah CSA, Green Bay MSA, Madison-Janesville-Beloit CSA, and WI Non-Metro AA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance under the Lending Test in the Fond du Lac MSA is stronger than the bank's overall performance under the Lending Test in the full-scope area. Performance is stronger due to stronger geographic and borrower income distribution performance. Performance under the Lending Test in the Racine MSA is weaker than the bank's overall performance primarily due to the lack of CD lending.

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

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Wisconsin is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. Current and prior period investments represent 13.0 percent of allocated tier 1 capital. The majority or 58.3 percent of total investments represent current period investments.

The bank exhibits excellent responsiveness to credit and community economic development needs. Identified credit needs are affordable housing, affordable rental housing, financial capability training for the underserved, and economic and workforce development. Affordable and rental housing comprised 65.3 percent of total qualified investment dollars in the AA and created or retained 3,633 housing units for low- and moderate-income individuals and families. Revitalization/stabilization represented 18.9 percent of investments and community services 15.8 percent. Sixty-four grants totaling \$5.8 million

were provided to a variety of organizations for purposes of affordable housing, revitalization/stabilization, and community services. In some occurrences, grants were provided in multiple years.

The bank makes extensive use of innovative and/or complex investments to support CD initiatives. Current and prior period complex investments were 53.9 percent or \$55.6 million of total investments, mainly related to affordable housing, community service, and revitalization/stabilization. Investments included seven Direct Investor LIHTC and 11 NMTC transactions. LIHTC investments required bank expertise and capacity in selecting projects and partners, negotiating agreements, overseeing project development and operations, and ensuring compliance. Thirty-two percent or \$33.0 million of total investments served as catalysts for future growth and other improvements.

Examples of CD Investments in the AA include:

- The bank provided a \$1.7 million grant (total grant \$3.5 million) to an organization for a program located in Milwaukee. The organization is rooted in the MKE United Strategic Action Agenda, an integrated economic development plan for inclusive growth of Milwaukee's downtown and adjacent communities. Targeted commercial districts are in three low- and moderate-income neighborhoods close to downtown that have suffered from historical disinvestment and are in opportunity zones. They include the north side-Martin Luther King Drive, North Fond Du Lac Avenue, and the south side-Cesar Chavez Drive and National Avenue. These programs will inject capital and financial and technical assistance for businesses to fuel expansion, redevelopment, and revitalization in low- and moderate-income neighborhoods.
- The bank originated an \$8.9 million LIHTC investment for apartments located in Milwaukee, Wisconsin. The new construction project was a 65-unit mixed-use development in a five-story elevator-serviced building. Fifty-six (56) units were restricted to families earning up to 30, 50, and 60 percent of AMI, along with nine (9) market rate units. Thirteen (13) units were set aside at 30 percent AMI targeted for veterans and their families who are at risk of homelessness and require access to specific resources and services. Service organizations will help meet the needs of veteran tenants.
- The bank originated an \$8.5 million NMTC equity investment to finance the construction of a K-12 school located in a low-income census tract in Milwaukee, WI. The school provides access to college preparatory education and primarily serves low-income students in Wisconsin neighborhoods where access to excellent schools is limited. Over 600 students were housed in the four-story, 200,000 square foot facility in 2017 with 1,500 students expected by 2021. Estimates showed at least 85 percent of the students would be eligible for free or reduced-rate lunches. Bank financing enabled the school to provide a community health clinic, gym, track, soccer facility, swimming facility, playground, and handball courts. The project created new construction jobs.

Qualified Investments – State of Wisconsin										
Assessment Area (AA)	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-scope Review:										
Milwaukee-Waukesha-West Allis MSA	46	43,053	88	60,114	134	48.9	103,167	32.4	0	0
Limited Reviews:										
Appleton-Oshkosh-Neenah CSA	6	2,804	10	20,837	16	5.8	23,641	7.4	0	0
Fond du Lac MSA	3	932	2	1,645	5	1.8	2,576	.8	0	0
Green Bay MSA	3	4,333	1	2,984	4	1.5	7,317	2.3	0	0
Madison-Janesville-Beloit CSA	10	3,582	20	104,877	30	10.9	108,458	34.0	0	0
Racine MSA	3	30	1	49	4	1.5	79	0.0	0	0
WI Non-Metro AA	2	47	2	5,729	4	1.5	5,776	1.8	0	0
Statewide Investments with Purpose, Mandate, or Function (P/M/F) to Serve AAs	0	0	54	63,942	54	19.7	63,942	20.1	0	0
Statewide Investments with No Purpose, Mandate, or Function (P/M/F) to Serve AAs	23	3,771	0	0	23	8.4	3,771	1.2	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.

Statewide Investments in the State of Wisconsin

Qualified Investments with and without a P/M/F to serve areas in the broader statewide area had a positive impact on the overall state of Wisconsin Investment Test rating. Thirty-one (31) support affordable housing, 22 support community service, and one (1) supports revitalization/stabilization. Affordable housing investments totaled \$50.2 million, community service \$7.9 million, and revitalization/stabilization \$5.8 million. Twenty (20) of the community service investments were grants provided to consumer credit counseling agencies for financial education to low- and moderate-income individuals and families to assist them in using credit responsibly and building assets. These investments enhanced the bank's overall Investment Test rating for the state of Wisconsin.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall Outstanding Investment Test rating and did not significantly change the initial overall conclusions based on the AA receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton-Oshkosh-Neenah CSA, Fond du Lac MSA, Green Bay MSA, Madison-Janesville-Beloit CSA and WI Non-Metro AA is consistent with the bank's overall performance under the Investment Test in the full-scope area. Strong performance is due to high levels of investments in relation to allocated tier 1 capital. Performance in the Racine MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance is based on low levels of qualified investments compared to allocated tier 1 capital.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, including the data in the tables below, the bank's performance in the Milwaukee MSA is good.

Retail Banking Services

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

Examiners evaluated the data as outlined in the Scope section at the front of this document including bank-provided data on usage of branches adjacent to low- and moderate-income geographies by individuals residing in those geographies and on increases in the usage of alternative delivery systems.

Based on the data in the table below and performance context, the branch distribution is good. In low- and moderate-income geographies, the distribution is respectively near to and well below the percentage of the population. The bank had four branches in low-income geographies and two branches in moderate-income geographies. The distribution was augmented by two MUI tract branches that serve moderate-income tracts. Examiners reviewed data on the accounts held and transactions conducted at the adjacent MUI branches and confirmed they were serving those low- and moderate-income populations.

Distribution of Branch Delivery System								As of December 31, 2019			
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
Milwaukee MSA	66.9	28	49.1	14.3	7.1	25.0	53.6	16.7	14.9	33.7	34.7

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

Alternative delivery systems enhanced the delivery of banking services to geographies and individuals of all income levels. The OCC considered the availability and use of alternative delivery systems over the evaluation period. This included review of the bank's 60 deposit-taking ATMs, online banking, mobile banking, and telephone banking to determine the effectiveness of these systems to make retail banking services available to individuals in low- and moderate-income geographies. The bank increased the deposit-taking ATMs in low- and moderate-income geographies by 70.0 percent over the prior rating period to ten (16.7 percent) deposit-taking ATMs in low-income geographies and seven (11.7 percent) ATMs in moderate-income geographies. Additionally, bank-provided data on use of online, mobile, and telephone banking showed increases in the adoption of these services by low- and moderate-income individuals from the prior rating period.

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

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank closed one branch in a low-income geography and did not open or close any branches in moderate-income geographies. The branch closure was due to reduced customer usage and unprofitability. Despite the branch closure, branch locations remained accessible to geographies and individuals of different income levels in the bank's AA.

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. Generally, branches are open Monday through Friday from 9:00 am to 6:00 pm and Saturday from 9:00 am to 2:00 pm. All retail banking services are available at all branches within the low- and moderate-income geographies.

Community Development Services

The bank had a significant level of CD services that were responsive to AA needs.

Bank records show employees provided nearly 594 qualified CD service activities to 21 organizations, logging over 3,153 hours over a six-year period which benefitted more than 9,015 low- and moderate-income individuals. All the bank's assistance was to organizations that provide community services to low- and moderate-income individuals and families. The bank's community development services responsiveness varies to the community needs in the AA, particularly community services. Nonprofit and community partners identified the following needs in the community, affordable housing, and affordable rental housing. The following are examples of CD services provided:

- Bank employees provided more than 314 hours of board service for four different nonprofits that serve the needs of low- and moderate-income communities.
- The bank provided more than 60 homebuyer workshops and seminars for more than 90 hours, impacting approximately 2,000 low- and moderate-income individuals.
- Bank employees provided more than 150 training sessions for more than 600 hours, impacting more than 150 low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was factored into the state's overall High Satisfactory Service Test rating and did not significantly change the initial overall conclusions based on the AAs receiving full-scope review. Based on limited-scope reviews, the bank's performance under the Service Test in the WI Non-Metro AA is stronger than the bank's overall performance under the Service Test in the full-scope area due to stronger branch distribution in low- and moderate-income geographies. The bank's performance in the Fond du Lac MSA, Green Bay MSA, Madison-Janesville-Beloit CSA, and Racine MSA is consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance under the Appleton-Oshkosh-Neenah CSA is well below the bank's overall performance under the Service Test in the full-scope area due to no branches in moderate-income geographies. This AA had no low-income tracts.

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-Metro AAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2014, through December 31, 2019	
Bank Products Reviewed:	Home mortgage loans consisting of home purchase, home improvement and home refinance, small business loans including business credit cards, small farm loans, community development loans including letters of credit, qualified investments, and qualified community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Banc One Community Development Corporation	Subsidiary	Community Development Investments
Banc One Neighborhood Development Corporation	Affiliate	Community Development Investments
Chase Bank USA, N.A. (through 2018 only)	Affiliate	Business Credit Cards
Chase Community Development Corporation	Subsidiary	Community Development Investments
Chase Community Equity, LLC	Subsidiary	Community Development Investments
CDB Chase New Markets Corp Sub-CDE Elimination Company	Subsidiary	Community Development Investments
Chase New Markets Corporation	Subsidiary	Community Development Loans and Investments
Chase NMTC CFHC Investment Fund, LLC	Subsidiary	Community Development Investments
CHASE NMTC CHASS INVESTMENT FUND, LLC	Subsidiary	Community Development Investments
Chase NMTC Cook Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Emerge Center Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC KIPP Bronx Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Madison Theatre Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Mercy Oakwood Shores Invest. Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Refresh Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC San Pablo Helms Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Shops and Lofts Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Swedish Covenant Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Testa Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC Truong Investment Fund, LLC	Subsidiary	Community Development Investments
Chase NMTC WIS27 Investment Fund, LLC	Subsidiary	Community Development Investments
CL II Holdings LLC	Affiliate	Community Development Investments
CL II Management LLC	Affiliate	Community Development Investments
CNMC SUB-CDE 1, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 10, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 11, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 12, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 122, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 123, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 127, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 13, LLC	Subsidiary	Community Development Investments

CNMC SUB-CDE 14, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 149, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 15, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 150, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 156, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 157, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 159, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 16, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 160, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 161, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 162, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 164, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 165, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 166, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 167, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 168, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 17, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 18, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 2, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 20, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 21, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 24, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 3, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 4, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 5, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 7, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 8, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 89, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 9, LLC	Subsidiary	Community Development Investments
CNMC SUB-CDE 90, LLC	Subsidiary	Community Development Investments
Commercial Lending II LLC	Affiliate	Community Development Investments
		Community Development Loans and Investments
Conglomerate – Master NMTC Investment Fund	Subsidiary	
First Chicago Leasing Corporation	Affiliate	Community Development Investments
FNBC Leasing Corporation	Subsidiary	Community Development Investments
Gilford Capital Fund II, LLC	Subsidiary	Community Development Investments
ICIB Fund I Holdings, Inc.	Subsidiary	Community Development Investments
J.P. Morgan Chase Community Development Corporation	Affiliate	Community Development Loans and Investments
JPMC Specialty Morgan LLC	Subsidiary	Community Development Investments
JPMorgan Chase & Company	Affiliate	Community Development Investments
Plainfield Tower West, LLC	Subsidiary	Community Development Investments
Protech Tax Credit Fund III, LLC	Subsidiary	Community Development Investments
Providian Bancorp Services	Subsidiary	Community Development Investments
Rivergrade Investment Corporation	Subsidiary	Community Development Investments
RPC SPE, LLC	Subsidiary	Community Development Investments
WaMu 2007 MF-1 Trust	Subsidiary	Community Development Investments
Washington Mutual Community Development, Inc.	Subsidiary	Community Development Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
New York-Newark CSA	Full-Scope	CT: Bridgeport-Stamford-Norwalk MSA (County of Fairfield), and New Haven- Milford MSA (County of New Haven)

		<p>NY: New York-Newark-Jersey City MSA (Counties of Bronx, Kings, Nassau, New York, Putnam, Queens, Richmond, Rockland, Suffolk, and Westchester)</p> <p>Kingston MSA (County of Ulster), and Poughkeepsie-Newburgh-Middletown MSA (County of Dutchess and Orange)</p> <p>NJ: New York-Newark-Jersey City MSA (Counties of Bergen, Essex, Hunterdon, Hudson, Morris, Middlesex, Monmouth, Ocean, Passaic Somerset, Sussex, and Union); Trenton-Princeton MSA (County of Mercer); and Allentown-Bethlehem-Easton MSA (County of Warren, NJ)</p>
Chicago-Naperville CSA	Full-Scope	<p>IL: Chicago-Naperville-Evanston MSA (Counties of Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will)</p> <p>IN: Chicago-Naperville-Evanston MSA (Counties of Lake and Porter), and Michigan City-La Porte MSA (County of LaPorte)</p> <p>WI: Chicago-Naperville-Evanston MSA (County of Kenosha)</p>
Philadelphia-Reading-Camden MMSA (Philadelphia MMSA)	Full-Scope	<p>DE: Philadelphia-Camden-Wilmington MSA (County of New Castle)</p> <p>NJ: Philadelphia-Camden-Wilmington MSA (Counties of Burlington and Camden)</p> <p>PA: Philadelphia-Camden-Wilmington MSA (Counties of Bucks, Chester, Delaware, Montgomery, and Philadelphia)</p>
Washington-Arlington-Alexandria MMSA	Full-Scope	<p>DC: Washington-Arlington-Alexandria MD: (County of District of Columbia)</p> <p>MD: Washington-Arlington-Alexandria MD: (County of Prince George's)</p> <p>VA: Washington-Arlington-Alexandria DC-VA-MD-WV MD: (Counties of Arlington, Fairfax, Prince William, and Loudoun),</p>

		and Cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park
Portland-Vancouver-Salem CSA	Full-Scope	OR: Albany-Lebanon MSA (County of Linn), Corvallis MSA (County of Benton), Portland-Vancouver-Hillsboro MSA (Counties of Clackamas, Columbia, Multnomah, Washington, and Yamhill), and Salem, OR MSA (Counties of Marion and Polk) WA: Longview MSA (County of Cowlitz), and Portland-Vancouver-Hillsboro MSA (County of Clark)
Louisville/Jefferson County-Elizabethtown--Bardstown CSA	Full-Scope	IN: Louisville/Jefferson County MSA (Counties of Clark, Floyd, and Harrison) KY: Elizabethtown-Fort Knox MSA (County of Hardin); and Louisville/Jefferson County MSA (Counties of Jefferson, Oldham, and Shelby)
Cincinnati-Wilmington-Maysville MMSA	Full-Scope	KY: Cincinnati MSA (Counties of Boone, Campbell, and Kenton) OH: Cincinnati MSA (Counties of Butler, Clermont, Hamilton, and Warren)
Wheeling MMSA	Full-Scope	OH: Wheeling MSA (County of Belmont) WV: Wheeling MSA (Counties of Marshall and Ohio)
State of Arizona		
Phoenix-Mesa-Chandler MSA	Full-Scope	Phoenix-Mesa-Chandler MSA, (Counties of Maricopa and Pinal)
Tucson MSA	Full-Scope	Tucson MSA (County of Pima)
Flagstaff MSA	Limited-Scope	Flagstaff MSA (County of Coconino)
Lake Havasu City-Kingman MSA	Limited-Scope	Lake Havasu City-Kingman MSA (County of Mohave)
Prescott Valley-Prescott MSA	Limited-Scope	Prescott Valley-Prescott MSA, (County of Yavapai)
Sierra Vista-Douglas MSA	Limited-Scope	Sierra Vista-Douglas MSA (County of Cochise)
Yuma MSA	Limited-Scope	Yuma MSA (County of Yuma)

AZ Non-Metro Roll-up	Limited-Scope	Nogales MiSA (County of Santa Cruz), Show Low MiSA (County of Navajo), Safford MiSA (County of Graham), Payson MiSA (County of Gila), and County of La Paz
State of California		
Los Angeles-Long Beach CSA	Full-Scope	Los Angeles-Long Beach-Anaheim MSA (Counties of Los Angeles and Orange), Oxnard-Thousand Oaks-Ventura MSA (County of Ventura), and Riverside-San Bernardino-Ontario MSA (Counties of Riverside and San Bernardino)
San Jose-San Francisco-Oakland CSA	Full-Scope	Napa MSA (County of Napa); San Francisco-Oakland-Berkeley MSA (Counties of Alameda and Contra Costa), Marin, San Francisco, and San Mateo San Jose-Sunnyvale-Santa Clara MSA (Counties of San Benito and Santa Clara); Santa Cruz-Watsonville MSA (County of Santa Cruz), Santa Rosa-Petaluma MSA (County of Sonoma), Stockton MSA (County of San Joaquin), and Vallejo MSA (County of Solano)
Bakersfield MSA	Full-Scope	Bakersfield MSA (County of Kern)
Chico MSA	Limited-Scope	Chico MSA (County of Butte)
El Centro MSA	Limited-Scope	El Centro MSA (County of Imperial)
Fresno-Madera CSA	Limited-Scope	Fresno MSA (County of Fresno), and Madera MSA (County of Madera)
Modesto-Merced MSA	Limited-Scope	Modesto-Merced MSA (County of Stanislaus)
Redding-Red Bluff CSA	Limited-Scope	Redding MSA (County of Shasta), and Red Bluff MiSA (County of Tehama)
Sacramento-Roseville CSA	Limited-Scope	Sacramento-Roseville-Folsom MSA (Counties of El Dorado, Placer, Sacramento, and Yolo) Truckee-Grass Valley MiSA (County of Nevada), and Yuba City MSA (Counties of Sutter and Yuba)

Salinas MSA	Limited-Scope	Salinas MSA (County of Monterey)
San Diego-Chula Vista-Carlsbad MSA	Limited-Scope	San Diego-Carlsbad MSA (County of San Diego)
San Luis Obispo-Paso Robles MSA	Limited-Scope	San Luis Obispo-Paso Robles MSA (County of San Luis Obispo)
Santa Maria-Santa Barbara MSA	Limited-Scope	Santa Maria-Santa Barbara MSA (County of Santa Barbara)
Visalia-Porterville-Hanford CSA	Limited-Scope	Visalia MSA (County of Tulare), and Hanford-Corcoran MSA (County of King)
CA Non-Metro Roll-up	Limited-Scope	Clearlake MiSA (County of Lake), Crescent City MiSA (County of Del Norte), Eureka-Arcata MiSA (County of Humboldt), Ukiah MiSA (County of Mendocino), and Counties of Inyo and Siskiyou
State of Colorado		
Denver-Aurora CSA	Full-Scope	Boulder MSA (County of Boulder), and Greeley MSA (County of Weld)
Colorado Springs MSA	Limited-Scope	Colorado Springs MSA (Counties of El Paso and Teller)
Fort Collins, CO MSA	Limited-Scope	Fort Collins MSA (County of Larimer)
CO Non-Metro Roll-up	Limited-Scope	Glenwood Springs MiSA (County of Pitkin)
State of Florida		
Miami-Port St. Lucie- Fort Lauderdale CSA	Full-Scope	Miami-Fort Lauderdale-Pompano Beach MSA (Counties of Broward, Miami-Dade, Palm Beach) Port St. Lucie MSA (Counties of Martin and St. Lucie), and Sebastian-Vero Beach MSA (County of Indian River)
Orlando-Deltona-Daytona Beach CSA	Full-Scope	Deltona-Daytona Beach-Ormond Beach MSA (Counties of Flagler and Volusia); Orlando-Kissimmee-Sanford MSA (Counties of Lake, Orange, Osceola, and Seminole), and The Villages MSA (County of Sumter);

Cape Coral-Fort Myers-Naples CSA	Limited-Scope	Cape Coral-Fort Myers MSA (County of Lee), and Naples-Marco Island MSA (County of Collier)
Gainesville MSA	Limited-Scope	Gainesville-Lake City MSA (Counties of Alachua, Gilchrist, and Levy)
Jacksonville MSA	Limited-Scope	Jacksonville MSA (Counties of Baker, Clay, Duval, Nassau, and St. Johns)
Lakeland-Winter Haven MSA	Limited-Scope	Lakeland-Winter Haven MSA (County of Polk)
North Port-Sarasota CSA	Limited-Scope	North Port-Sarasota-Bradenton MSA (Counties of Manatee and Sarasota), and Punta Gorda MSA (County of Charlotte)
Ocala MSA	Limited-Scope	Ocala MSA (County of Marion)
Palm Bay-Melbourne-Titusville MSA	Limited-Scope	Palm Bay-Melbourne-Titusville MSA (County of Brevard)
Tallahassee-MSA	Limited-Scope	Tallahassee-Bainbridge MSA (Counties of Jefferson, Leon, and Wakulla)
Tampa-St. Petersburg-Clearwater MSA	Limited-Scope	Tampa-St. Petersburg-Clearwater MSA (Counties of Hernando, Hillsborough, Pasco, Pinellas)
State of Georgia		
Atlanta-Athens-Clarke County-Sandy Springs CSA	Full-Scope	Atlanta-Sandy Springs-Alpharetta MSA (Counties of Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, and Rockdale), and Gainesville MSA (County of Hall)
State of Idaho		
Boise City MSA	Full-Scope	Boise City MSA (Counties of Ada and Canyon)
Coeur d'Alene MSA	Limited-Scope	Coeur d'Alene MSA (County of Kootenai)
Idaho Falls MSA	Limited-Scope	Idaho Falls MSA (County of Bonneville)
Pocatello MSA	Limited-Scope	Pocatello MSA (County of Bannock)
Twin Falls MSA	Limited-Scope	Twin Falls MSA (County of Twin Falls)
ID Non-Metro Roll-up	Limited-Scope	Mountain Home MiSA (County of Elmore); and Moscow MiSA (County of Latah)
State of Illinois		
Champaign-Urbana MSA	Full-Scope	Champaign-Urbana MSA (Counties of Champaign and Piatt)
Bloomington MSA	Limited-Scope	Bloomington MSA (County of McLean)
Davenport-Moline-Rock Island MSA	Limited-Scope	Davenport Moline-Rock Island MSA (Counties of Henry and Rock Island)
Peoria MSA	Limited-Scope	Peoria MSA (Counties of Marshall, Peoria, Stark, Tazewell, and Woodford)

Rockford MSA	Limited-Scope	Rockford MSA (Counties of Boone and Winnebago)
Springfield MSA	Limited-Scope	Springfield MSA (Counties of Menard and Sangamon)
State of Indiana		
Indianapolis-Carmel-Muncie CSA	Full-Scope	Indianapolis-Carmel-Anderson MSA (Counties of Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, and Morgan); Muncie MSA (County of Delaware) and Crawfordsville MiSA (Counties of Montgomery)
Bloomington-Bedford CSA	Limited-Scope	Bloomington MSA (County of Monroe) and Bedford MiSA (County of Lawrence)
Fort Wayne-Huntington-Auburn CSA	Limited-Scope	Fort Wayne MSA (County of Allen and Whitley County), and Kendallville MiSA (County of Noble)
Lafayette-West Lafayette MSA	Limited-Scope	Lafayette-West Lafayette MSA (County of Tippecanoe)
South Bend-Elkhart-Mishawaka CSA	Limited-Scope	Elkhart-Goshen MSA (County of Elkhart) South Bend-Mishawaka MSA (County of St. Joseph)
IN Non-Metro	Limited-Scope	Richmond MiSA (County of Wayne) and Scottsburg MiSA (County of Scott)
State of Kentucky		
Lexington-Fayette--Richmond--Frankfort CSA	Full-scope	Lexington-Fayette MSA (Counties of Fayette and Jessamine) and Richmond-Berea MiSA (County of Madison)
Bowling Green MSA	Limited-Scope	Bowling Green MSA (County of Warren)
Owensboro MSA	Limited-Scope	Owensboro MSA (County of Daviess)
KY Non-Metro Roll-up	Limited-Scope	Danville MiSA (Counties of Boyle and Lincoln)
State of Louisiana		
Baton Rouge MSA	Full-Scope	Baton Rouge MSA (Parish of Ascension, East Baton Rouge, Iberville, Livingston, and West Baton Rouge)
Monroe-Ruston CSA	Full-Scope	Monroe MSA (Parish of Quachita), and Ruston MiSA (Parish of Lincoln)
Alexandria MSA	Limited-Scope	Alexandria MSA (Parish of Rapides)

Houma-Thibodaux MSA	Limited-Scope	Houma-Thibodaux MSA (Parish of Lafourche and Terrebonne)
Lafayette-Opelousas CSA	Limited-Scope	Lafayette MSA (Parish of Acadia, Iberia, Lafayette, St. Martin, and Vermillion), and Opelousas MiSA (Parish of St. Landry)
Lake Charles MSA	Limited-Scope	Lake Charles MSA (Parish of Calcasieu)
New Orleans-Metairie-Hammond CSA	Limited-Scope	New Orleans-Metairie MSA (Parish of Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany), and Hammond MSA (Parish of Tangipahoa)
Shreveport-Bossier City MSA	Limited-Scope	Shreveport-Bossier City, LA MSA (Parish of Bossier, Caddo and De Soto)
LA Non-Metro Roll-up	Limited-Scope	DeRidder MiSA (Parish of Beauregard)
State of Massachusetts		
Boston-Worcester-Providence CSA	Full-Scope	Boston-Cambridge-Newton MSA (Counties of Norfolk, Essex, Middlesex, Plymouth, and Suffolk), and Worcester MSA (County of Worcester)
Pittsfield MSA	Limited-Scope	Pittsfield MSA (County of Berkshire)
Springfield MSA	Limited-Scope	Springfield MSA (County of Hampden)
State of Michigan		
Detroit-Warren-Ann Arbor CSA	Full-Scope	Ann Arbor MSA (County of Washtenaw), Detroit-Warren-Dearborn MSA (Counties of Lapeer, Livingston, Macomb, Oakland, St. Clair, and Wayne), and Flint MSA (County of Genesee)
Grand Rapids-Kentwood-Muskegon CSA	Limited-Scope	Grand Rapids-Kentwood MSA (Counties of Ionia, Montcalm, and Ottawa), and Muskegon, MI MSA (County of Muskegon)
Kalamazoo-Battle Creek-Portage CSA	Limited-Scope	Battle Creek MSA (County of Calhoun), and Kalamazoo-Portage MSA (County of Kalamazoo)
Lansing-East Lansing MSA	Limited-Scope	Lansing-East Lansing MSA (Counties of Clinton, Eaton, Ingham, and Shiawassee) Owosso MiSA: (County of Shiawassee)
Niles MSA	Limited-Scope	Niles MSA (County of Berrien)
Saginaw MSA	Limited-Scope	Saginaw MSA (County of Saginaw)

MI Non-Metro Roll-up	Limited-Scope	Traverse City MiSA (Counties of Benzie, Grand Traverse and Kalkaska) City Petosky, County of Sanilac, and Township of Roscommon
State of Nevada		
Las Vegas-Henderson-Paradise MSA	Full-Scope	Las Vegas-Henderson-Paradise MSA (County of Clark)
Reno MSA	Limited-Scope	Reno MSA (County of Washoe)
State of New York		
Rochester MSA	Full-Scope	Rochester MSA (Counties of Monroe, Ontario, and Wayne)
Syracuse MSA	Limited-Scope	Syracuse MSA (Counties of Madison, Onondaga, and Oswego)
NY Non-Metro Roll-up	Limited-Scope	County of Sullivan
State of Ohio		
Columbus MSA	Full-Scope	Columbus MSA (Counties of Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, and Union)
Cleveland-Akron-Canton CSA	Limited-Scope	Akron MSA (Counties of Portage and Summit) Cleveland-Elyria MSA (Counties of Cuyahoga, Geauga, Lake, Lorain, and Medina), and Canton-Massillon MSA (County of Stark)
Dayton-Springfield-Kettering, CSA	Limited-Scope	Dayton-Kettering MSA (Counties of Greene, Miami, and Montgomery) and Springfield MSA (County of Clark)
Youngstown-Warren-Boardman MSA	Limited-Scope	Youngstown-Warren MSA (Counties of Mahoning and Trumbull)
Lima MSA	Limited-Scope	Lima MSA (County of Allen)
Mansfield MSA	Limited-Scope	Mansfield MSA (County of Richland)
Toledo MSA	Limited-Scope	Mansfield MSA (Counties of Lucas and Wood)
Weirton-Steubenville MSA	Limited-Scope	Weirton-Steubenville MSA (County of Jefferson)
OH Non-Metro Roll-up	Limited-Scope	Ashland MiSA (County of Ashland), Athens MiSA (County of Athens), Celina MiSA (County of Merer), Coshocton MiSA (County of Coshocton), Findlay MiSA (County of Hancock), Greenville MiSA (County of Darke), Marietta MiSA (County of Washington), Marion MiSA (County of Marion) New Philadelphia-Dover MiSA (County of Tuscarawas), Salem MiSA (County of Columbiana), Sidney MiSA (County of Shelby),

		Wapakoneta MiSA (County of Auglaize), Wooster MiSA (County of Wayne); and Zanesville MiSA (County of Muskingum), Counties of Preble and Wyandot
State of Oklahoma		
Oklahoma City MSA	Full-Scope	Oklahoma City MSA (Counties of Canadian, Cleveland and Oklahoma)
Tulsa MSA	Limited-Scope	Tulsa MSA (County of Tulsa)
State of Oregon		
Medford-Grants Pass CSA	Full-Scope	Grants Pass MSA (County of Josephine), and Medford, MSA (County of Jackson)
Bend-Redmond-Prineville CSA	Limited-Scope	Bend MSA (County of Deschutes)
Eugene-Springfield MSA	Limited-Scope	Eugene-Springfield MSA (County of Lane)
OR Non-Metro Roll-up	Limited-Scope	Brookings MiSA (County of Curry), Coos Bay MiSA (County of Coos), Klamath Falls MiSA (County of Klamath), Newport MiSA (County of Lincoln), and Roseburg MiSA (County of Douglas)
State of Texas		
Austin-Round Rock-Georgetown MSA	Full-Scope	Austin-Round Rock-Georgetown MSA (Counties of Bastrop, Caldwell, Hays, and Travis)
Dallas-Fort Worth CSA	Full-Scope	Dallas-Fort Worth-Arlington MSA (Counties of Collin, Dallas, Denton, Ellis, Hunt, Johnson, Kaufman, Parker, Rockwall, and Tarrant) Sherman-Denison MSA (County of Grayson)
Houston-The Woodlands-Sugar Land MSA	Full-Scope	Houston-The Woodlands-Sugar Land MSA (Counties of Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller)
Abilene MSA	Limited-Scope	Abilene MSA (County of Taylor)
Amarillo MSA	Limited-Scope	Amarillo MSA (Counties of Potter and Randall)
Beaumont-Port Arthur MSA	Limited-Scope	Beaumont-Port Arthur MSA (Counties of Jefferson and Orange)
Brownsville-Harlingen MSA	Limited-Scope	Brownsville-Harlingen MSA (County of Cameron)
College Station-Bryan MSA	Limited-Scope	College Station-Bryan MSA (County of Brazos)
El Paso MSA	Limited-Scope	El Paso MSA (County of El Paso)
Killeen-Temple MSA	Limited-Scope	Killeen-Temple MSA (County of Bell)
Laredo MSA	Limited-Scope	Laredo MSA (County of Webb)
Longview MSA	Limited-Scope	Longview MSA (County of Gregg and Harrison)
Lubbock MSA	Limited-Scope	Lubbock MSA (County of Lubbock)

McAllen-Edinburg-Mission MSA	Limited-Scope	McAllen-Edinburg-Mission MSA (County of Hidalgo)
Midland MSA	Limited-Scope	Midland MSA (County of Midland)
Odessa MSA	Limited-Scope	Odessa MSA (County of Ector)
San Antonio-New Braunfels MSA	Limited-Scope	San Antonio-New Braunfels MSA (Counties of Bexar, Comal, and Guadalupe)
Tyler MSA	Limited-Scope	Tyler, MSA (County of Smith)
Waco MSA	Limited-Scope	Waco MSA (County of Falls)
Wichita Falls MSA	Limited-Scope	Wichita Falls MSA (County of Wichita)
TX Non-Metro Roll-up	Limited-Scope	Brenham MiSA (County of Washington), Corsicana MiSA (County of Navarro), Fredericksburg MiSA (County of Gillespie), Granbury MiSA (County of Hood), Levelland MiSA (County of Hockley), and the City of Marshall
State of Utah		
Salt Lake City-Provo-Orem CSA	Full-Scope	Ogden-Clearfield MSA (Counties of Davis and Weber), Provo-Orem MSA (County of Utah), and Salt Lake City MSA (Counties of Salt Lake and Tooele)
St. George MSA	Limited	St. George MSA (County of Washington)
Logan MSA	Limited-Scope	Logan MSA (County of Cache)
UT Non-Metro Roll-up	Limited-Scope	Counties of Heber and Summit Park
State of Washington		
Seattle-Tacoma CSA	Full-Scope	Bremerton-Silverdale-Port Orchard MSA (County of Kitsap) Mount Vernon-Anacortes MSA (County of Skagit) Olympia-Lacey-Tumwater MSA (County of Thurston) Seattle-Tacoma-Bellevue MSA (Counties of King, Pierce, and Snohomish) Centralia MiSA (County of Lewis) Oak Harbor MiSA (County of Island), and Shelton MiSA (County of Mason)
Spokane-Spokane Valley MSA	Full-Scope	Spokane-Spokane Valley MSA (Counties of Spokane and Stevens)
Bellingham MSA	Limited-Scope	Bellingham MSA (County of Whatcom)
Yakima MSA	Limited-Scope	Yakima MSA (County of Yakima)
Wenatchee MSA	Limited-Scope	Wenatchee MSA (Counties Chelan and Douglas)

Kennewick-Richland-Walla Walla CSA	Limited-Scope	Kennewick-Richland MSA (Counties of Benton and Franklin) Walla Walla MSA (County of Walla Walla)
WA Non-Metro Roll-up	Limited-Scope	Aberdeen MiSA (County of Grays Harbor), Ellensburg MiSA (County of Kittitas), Moses Lake MiSA (County of Grant), Port Angeles MiSA (County of Clallam), and Pullman MiSA (County of Whitman), and Counties of Jefferson and Okanogan
State of West Virginia		
Charleston-Huntington-Ashland CSA	Full-Scope	Charleston MSA (Counties of Boone, Clay, Jackson, Kanawha, and Lincoln), and Huntington-Ashland MSA (Counties of Cabell, Putnam, and Wayne)
Beckley MSA	Limited-Scope	Beckley MSA (Counties of Fayette and Raleigh)
WV Non-Metro Roll-up	Limited-Scope	Counties of Logan, Clarksburg, and Upshur
State of Wisconsin		
Milwaukee-Waukesha-West Allis MSA	Full-Scope	Milwaukee-Waukesha MSA (Counties of Milwaukee, Ozaukee, Washington, and Waukesha)
Appleton-Oshkosh-Neenah CSA	Limited-Scope	Appleton MSA (Counties of Calumet and Outagamie), and Oshkosh-Neenah MSA (County of Winnebago)
Fond du Lac MSA	Limited-Scope	Fond du Lac MSA (County of Fond du Lac)
Green Bay MSA	Limited-Scope	Green Bay MSA (County of Brown)
Madison-Janesville-Beloit CSA	Limited-Scope	Janesville-Beloit MSA (County of Rock), and Madison MSA (County of Dane)
Racine MSA	Limited-Scope	Racine MSA (County of Racine)
WI Non-Metro Roll-up	Limited-Scope	Beaver Dam MiSA (County of Dodge), Stevens Point (County of Portage), Watertown-Fort Atkinson MiSA (County of Jefferson), Whitewater MiSA (County of Walworth), and Counties of Langlade and Waupaca

Appendix B: Summary of MMSA and State Ratings

RATINGS: JPMorgan Chase Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
JPMorgan Chase Bank, N.A.	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
New York-Newark, NY-NJ-CT-PA CSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Chicago-Naperville, IL-IN-WI CSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Philadelphia-Reading-Camden, PA-NJ-DE MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Portland-Vancouver-Salem, OR-WA CSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville/Jefferson County-Elizabethtown--Bardstown, KY-IN CSA	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Cincinnati-Wilmington-Maysville, OH-KY MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Wheeling, WV-OH MMSA	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Arizona	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Colorado	Outstanding	Outstanding	Outstanding	Outstanding
Florida	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Georgia	Outstanding	Outstanding	High Satisfactory	Outstanding
Idaho	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Illinois	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Indiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Louisiana	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

Massachusetts	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	High Satisfactory	Outstanding	Outstanding	Outstanding
Nevada	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
New York	High Satisfactory	Outstanding	Outstanding	Outstanding
Ohio	High Satisfactory	Outstanding	Outstanding	Outstanding
Oklahoma	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Oregon	Outstanding	High Satisfactory	Outstanding	Outstanding
Texas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Utah	Outstanding	High Satisfactory	Outstanding	Outstanding
Washington	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Wisconsin	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans By Income Category of the Geography - Multi State (New York) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	57,710	27,112,100	63.75	427,179	3.14	2.74	3.96	13.53	11.83	13.62	37.49	32.09	34.74	45.78	53.25	47.61	0.06	0.10	0.07	
New York-Newark, NY-NJ-CT-PA CSA (2019)	32,810	17,316,808	36.25	N/A	3.14	3.03	N/A	13.53	11.90	N/A	37.49	33.16	N/A	45.78	51.81	N/A	0.06	0.10	N/A	
Limited Review:																				
Total	90,520	44,428,908	100.00	427,179	3.14	2.84	3.96	13.53	11.85	13.62	37.49	32.48	34.74	45.78	52.73	47.61	0.06	0.10	0.07	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (New York) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	57,710	27,112,100	63.75	427,179	24.82	3.00	3.99	15.57	12.38	12.86	17.43	19.78	19.74	42.19	55.39	47.64	0.00	9.45	15.76	
New York-Newark, NY-NJ-CT-PA CSA (2019)	32,810	17,316,808	36.25	N/A	24.82	3.69	N/A	15.57	13.30	N/A	17.43	21.00	N/A	42.19	52.45	N/A	0.00	9.55	N/A	
Limited Review:																				
Total	90,520	44,428,908	100.00	427,179	24.82	3.59	3.99	15.57	14.05	12.86	17.43	22.34	19.74	42.19	60.02	47.64	0.00	9.48	15.76	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (New York) 2017-2019																			
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate
Full Review:																			
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	261,218	5,782,985	58.80	706,770	7.48	7.04	7.08	15.66	16.27	15.30	29.20	27.25	30.09	46.61	48.69	46.60	1.05	0.75	0.93
New York-Newark, NY-NJ-CT-PA CSA (2019)	183,018	3,567,585	41.20	N/A	7.09	6.89	N/A	15.99	15.73	N/A	30.73	28.62	N/A	45.18	47.99	N/A	1.00	0.77	N/A
Limited Review:																			
Total	444,236	9,350,570	100.00	706,770	7.27	6.98	7.08	15.84	16.05	15.30	30.02	27.81	30.09	45.84	48.40	46.60	1.02	0.76	0.93

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (New York) 2017-2019											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	261,218	5,782,985	58.80	706,770	85.90	67.90	41.31	6.59	17.12	7.51	14.98
New York-Newark, NY-NJ-CT-PA CSA (2019)	183,018	3,567,585	41.20	N/A	87.56	72.94	N/A	5.64	18.55	6.80	8.51
Limited Review:											
Total	444,236	9,350,570	100.00	706,770	86.79	69.98	41.31	6.08	17.71	7.13	12.31

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (New York) 2017-2019																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review:																			
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	869	9,239	60.31	1,095	3.25	2.65	1.83	12.29	8.29	9.77	34.41	30.15	32.60	49.86	58.92	55.80	0.20	0.00	0.00
New York-Newark, NY-NJ-CT-PA CSA (2019)	572	6,793	39.69	N/A	3.73	3.15	N/A	13.17	8.22	N/A	35.63	35.31	N/A	47.29	52.62	N/A	0.18	0.70	N/A
Limited Review:																			
Total	1,441	16,032	100.00	1,095	3.50	2.85	1.83	12.76	8.26	9.77	35.05	32.20	32.60	48.50	56.42	55.80	0.19	0.28	0.00

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (New York) 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
New York-Newark, NY-NJ-CT-PA CSA (2017-2018)	869	9,239	60.31	1,095.00	95.77	75.03	46.48	2.72	9.44	1.51	15.54
New York-Newark, NY-NJ-CT-PA CSA (2019)	572	6,793	39.69	0.00	96.21	75.17	N/A	2.40	14.16	1.39	10.66
Limited Review:											
Total	1,441	16,032	100.00	1,095	96.01	75.09	46.48	2.55	11.31	1.44	13.60

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Chicago) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Full Review:																			
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	56,983	16,421,168	66.05	277,767	4.45	2.34	3.50	17.71	13.03	15.15	35.82	30.30	35.82	41.91	54.19	45.42	0.11	0.14	0.11
Chicago-Naperville, IL-IN-WI CSA (2019)	29,292	9,416,269	33.95	N/A	4.45	2.35	N/A	17.71	12.48	N/A	35.82	28.46	N/A	41.91	56.58	N/A	0.11	0.14	N/A
Limited Review:																			
Total	86,275	25,837,437	100.00	277,767	4.45	2.34	3.50	17.71	12.84	15.15	35.82	29.68	35.82	41.91	55.00	45.42	0.11	0.14	0.11

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Chicago) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Full Review:																			
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	56,983	16,421,168	66.05	277,767	23.36	5.82	7.37	16.42	18.48	17.73	18.80	20.06	21.06	41.42	48.05	37.21	0.00	7.60	16.63
Chicago-Naperville, IL-IN-WI CSA (2019)	29,292	9,416,269	33.95	N/A	23.36	4.92	N/A	16.42	18.07	N/A	18.80	20.15	N/A	41.42	51.17	N/A	0.00	5.69	N/A
Limited Review:																			
Total	86,275	25,837,437	100.00	277,767	23.36	5.92	7.37	16.42	19.71	17.73	18.80	21.59	21.06	41.42	52.78	37.21	0.00	6.95	16.63

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Chicago)																			2017-2019	
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	104,186	1,997,172	58.03	230,617	5.01	2.44	3.90	15.69	13.42	15.94	31.26	30.00	31.95	47.57	53.92	47.96	0.48	0.23	0.25	
Chicago-Naperville, IL-IN-WI CSA (2019)	75,357	1,297,836	41.97	N/A	4.94	2.72	N/A	15.56	13.62	N/A	30.46	30.73	N/A	48.58	52.68	N/A	0.46	0.24	N/A	
Limited Review:																				
Total	179,543	3,295,008	100.00	230,617	4.97	2.56	3.90	15.62	13.50	15.94	30.82	30.31	31.95	48.12	53.40	47.96	0.47	0.23	0.25	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Chicago)												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	104,186	1,997,172	58.03	230,617	80.94	65.01	43.02	7.88	18.44	11.18	16.54		
Chicago-Naperville, IL-IN-WI CSA (2019)	75,357	1,297,836	41.97	N/A	83.82	70.79	N/A	6.49	18.80	9.69	10.41		
Limited Review:													
Total	179,543	3,295,008	100.00	230,617	82.52	67.44	43.02	7.12	18.59	10.36	13.97		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Chicago) 2017-2019																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review:																			
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	425	5,363	58.46	1,224	3.00	1.88	0.57	13.33	4.47	5.56	42.19	38.12	59.97	41.43	55.53	33.91	0.05	0.00	0.00
Chicago-Naperville, IL-IN-WI CSA (2019)	302	3,418	41.54	N/A	3.16	0.33	N/A	13.78	4.64	N/A	41.22	47.68	N/A	41.77	47.35	N/A	0.07	0.00	N/A
Limited Review:																			
Total	727	8,781	100.00	1,224	3.09	1.24	0.57	13.57	4.54	5.56	41.67	42.09	59.97	41.61	52.13	33.91	0.06	0.00	0.00

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Chicago) 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Chicago-Naperville, IL-IN-WI CSA (2017-2018)	425	5,363	58.46	1,224.00	93.33	68.71	53.43	4.06	12.24	2.62	19.06
Chicago-Naperville, IL-IN-WI CSA (2019)	302	3,418	41.54	0.00	93.85	73.51	N/A	3.74	11.59	2.41	14.90
Limited Review:											
Total	727	8,781	100.00	1,224	93.61	70.70	53.43	3.89	11.97	2.51	17.33

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Philadelphia) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	732	163,064	23.76	99,271	5.34	1.64	3.07	20.47	18.44	19.35	34.30	38.25	34.65	39.87	41.53	42.91	0.02	0.14	0.02	
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	2,349	746,282	76.24	N/A	5.34	2.72	N/A	20.47	19.54	N/A	34.30	27.97	N/A	39.87	49.77	N/A	0.02	0.00	N/A	
Limited Review:																				
Total	3,081	909,346	100.00	99,271	5.34	2.47	3.07	20.47	19.28	19.35	34.30	30.41	34.65	39.87	47.81	42.91	0.02	0.03	0.02	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Philadelphia) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	732	163,064	23.76	99,271	23.54	6.42	7.96	16.62	14.48	16.89	18.46	16.12	19.60	41.39	32.38	36.45	0.00	30.60	19.10	
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	2,349	746,282	76.24	N/A	23.54	4.98	N/A	16.62	18.01	N/A	18.46	15.84	N/A	41.39	47.21	N/A	0.00	13.96	N/A	
Limited Review:																				
Total	3,081	909,346	100.00	99,271	23.54	6.48	7.96	16.62	20.92	16.89	18.46	19.38	19.60	41.39	53.22	36.45	0.00	17.92	19.10	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Philadelphia) 2017-2019																			
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate
Full Review:																			
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	3,236	40,642	27.76	68,194	5.10	2.69	4.39	20.39	16.44	18.35	29.52	31.71	30.50	44.06	48.95	46.14	0.94	0.22	0.63
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	8,423	109,989	72.24	N/A	5.18	2.92	N/A	20.87	16.68	N/A	29.29	29.09	N/A	43.76	50.88	N/A	0.90	0.43	N/A
Limited Review:																			
Total	11,659	150,631	100.00	68,194	5.15	2.86	4.39	20.65	16.61	18.35	29.39	29.81	30.50	43.90	50.35	46.14	0.92	0.37	0.63

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Philadelphia) 2017-2019											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	3,236	40,642	27.76	68,194	84.92	60.41	44.32	5.74	20.92	9.34	18.67
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	8,423	109,989	72.24	N/A	86.43	70.66	N/A	4.96	18.12	8.61	11.22
Limited Review:											
Total	11,659	150,631	100.00	68,194	85.73	67.82	44.32	5.32	18.90	8.95	13.29

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Philadelphia) 2017-2019																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review :																			
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	23	232	43.40	140	1.85	0.00	0.71	12.24	13.04	7.14	35.47	30.43	30.71	50.11	56.52	61.43	0.33	0.00	0.00
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	30	281	56.60	N/A	1.87	0.00	N/A	12.79	13.33	N/A	35.08	16.67	N/A	49.82	70.00	N/A	0.44	0.00	N/A
Limited Review :																			
Total	53	513	100.00	140	1.86	0.00	0.71	12.53	13.21	7.14	35.27	22.64	30.71	49.95	64.15	61.43	0.39	0.00	0.00

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Philadelphia) 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review :											
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2018)	23	232	43.40	140.00	94.72	78.26	37.14	3.07	17.39	2.20	4.35
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (2019)	30	281	56.60	0.00	95.07	80.00	N/A	2.77	16.67	2.16	3.33
Limited Review :											
Total	53	513	100.00	140	94.90	79.25	37.14	2.92	16.98	2.18	3.77

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Washington) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Full Review:																			
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2018)	1,019	472,563	16.94	177,437	3.92	4.51	5.03	16.52	11.97	16.53	35.48	33.46	34.99	43.92	49.85	43.26	0.16	0.20	0.19
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	4,997	2,871,159	83.06	N/A	3.92	6.64	N/A	16.52	12.99	N/A	35.48	29.52	N/A	43.92	50.45	N/A	0.16	0.40	N/A
Limited Review:																			
Total	6,016	3,343,722	100.00	177,437	3.92	6.28	5.03	16.52	12.82	16.53	35.48	30.19	34.99	43.92	50.35	43.26	0.16	0.37	0.19

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Washington) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Full Review:																			
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2018)	1,019	472,563	16.94	177,437	21.95	4.91	8.52	16.33	12.37	18.44	19.85	16.58	21.62	41.87	45.93	34.78	0.00	20.22	16.64
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	4,997	2,871,159	83.06	N/A	21.95	5.88	N/A	16.33	17.23	N/A	19.85	22.91	N/A	41.87	48.45	N/A	0.00	5.52	N/A
Limited Review:																			
Total	6,016	3,343,722	100.00	177,437	21.95	6.22	8.52	16.33	17.84	18.44	19.85	23.74	21.62	41.87	52.20	34.78	0.00	8.01	16.64

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Washington) 2017-2019

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	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% Aggregate	
Full Review:																				
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2018)	7,825	86,831	26.74	134,761	4.78	3.17	4.16	18.23	12.41	17.87	33.03	31.97	32.71	43.20	51.99	44.89	0.75	0.46	0.37	
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	21,443	279,521	73.26	N/A	4.73	3.29	N/A	18.04	11.70	N/A	33.33	31.45	N/A	43.26	53.11	N/A	0.64	0.45	N/A	
Limited Review:																				
Total	29,268	366,352	100.00	134,761	4.76	3.26	4.16	18.12	11.89	17.87	33.20	31.59	32.71	43.24	52.81	44.89	0.69	0.45	0.37	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Washington) 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2018)	7,825	86,831	26.74	134,761	84.65	65.69	48.51	6.04	17.51	9.31	16.81
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	21,443	279,521	73.26	N/A	87.24	71.19	N/A	4.92	17.38	7.84	11.43
Limited Review:											
Total	29,268	366,352	100.00	134,761	86.08	69.72	48.51	5.43	17.41	8.50	12.86

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Washington) 2017-2019																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review:																			
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2017-2018)	46	386	35.38	331	3.64	2.17	1.51	17.50	2.17	11.78	36.49	52.17	47.73	42.18	43.48	38.97	0.19	0.00	0.00
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	84	866	64.62	N/A	3.85	0.00	N/A	18.22	7.14	N/A	36.51	36.90	N/A	41.27	54.76	N/A	0.14	1.19	N/A
Limited Review:																			
Total	130	1,252	100.00	331	3.75	0.77	1.51	17.89	5.38	11.78	36.50	42.31	47.73	41.69	50.77	38.97	0.16	0.77	0.00

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Washington) 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2017-2018)	46	386	35.38	331.00	93.35	69.57	34.74	4.00	15.22	2.65	15.22
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (2019)	84	866	64.62	0.00	94.29	77.38	N/A	3.40	10.71	2.31	11.90
Limited Review:											
Total	130	1,252	100.00	331	93.86	74.62	34.74	3.67	12.31	2.47	13.08

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Portland) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Full Review:																			
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	8,621	3,088,978	61.60	123,144	1.18	1.23	1.29	18.27	19.09	19.19	49.04	40.99	48.83	31.47	38.65	30.64	0.04	0.03	0.04
Portland-Vancouver-Salem, OR-WA CSA (2019)	5,375	1,975,194	38.40	N/A	1.18	1.40	N/A	18.27	18.10	N/A	49.04	43.96	N/A	31.47	36.52	N/A	0.04	0.02	N/A
Limited Review:																			
Total	13,996	5,064,172	100.00	123,144	1.18	1.29	1.29	18.27	18.71	19.19	49.04	42.13	48.83	31.47	37.83	30.64	0.04	0.03	0.04

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Portland) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Full Review:																			
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	8,621	3,088,978	61.60	123,144	21.44	4.18	4.00	17.49	15.47	16.00	20.43	20.14	25.14	40.64	52.70	43.07	0.00	7.52	11.79
Portland-Vancouver-Salem, OR-WA CSA (2019)	5,375	1,975,194	38.40	N/A	21.44	4.93	N/A	17.49	19.20	N/A	20.43	23.16	N/A	40.64	48.02	N/A	0.00	4.69	N/A
Limited Review:																			
Total	13,996	5,064,172	100.00	123,144	21.44	4.77	4.00	17.49	18.07	16.00	20.43	22.76	25.14	40.64	54.40	43.07	0.00	6.43	11.79

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Portland) 2017-2019																			
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	% of Business-	% Bank Loans	% Aggregate	% of Business-	% Bank Loans	% Aggregate	% of Business-	% Bank Loans	% Aggregate	% of Business-	% Bank Loans	% Aggregate	% of Business-	% Bank Loans	% Aggregate
Full Review:																			
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	19,263	337,863	57.85	69,566	3.24	2.14	2.95	22.05	18.77	21.48	40.83	40.08	41.33	31.81	37.73	32.72	2.07	1.29	1.52
Portland-Vancouver-Salem, OR-WA CSA (2019)	14,038	219,138	42.15	N/A	3.14	2.10	N/A	21.85	19.13	N/A	41.00	40.33	N/A	32.09	37.14	N/A	1.93	1.30	N/A
Limited Review:																			
Total	33,301	557,001	100.00	69,566	3.19	2.12	2.95	21.94	18.92	21.48	40.92	40.18	41.33	31.96	37.48	32.72	1.99	1.29	1.52

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Portland) 2017-2019											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	19,263	337,863	57.85	69,566	87.10	72.25	48.33	4.58	14.40	8.32	13.36
Portland-Vancouver-Salem, OR-WA CSA (2019)	14,038	219,138	42.15	N/A	88.84	74.88	N/A	3.88	16.23	7.29	8.89
Limited Review:											
Total	33,301	557,001	100.00	69,566	88.04	73.36	48.33	4.20	15.17	7.76	11.47

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Portland) 2017-2019																			
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review:																			
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	378	3,872	57.19	1,329	1.93	1.85	0.75	13.65	6.61	6.85	55.24	60.58	63.66	28.78	30.95	28.52	0.40	0.00	0.23
Portland-Vancouver-Salem, OR-WA CSA (2019)	283	4,060	42.81	N/A	1.93	1.77	N/A	14.03	4.95	N/A	55.23	63.25	N/A	28.37	30.04	N/A	0.43	0.00	N/A
Limited Review:																			
Total	661	7,932	100.00	1,329	1.93	1.82	0.75	13.86	5.90	6.85	55.24	61.72	63.66	28.56	30.56	28.52	0.42	0.00	0.23

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Portland) 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Portland-Vancouver-Salem, OR-WA CSA (2017-2018)	378	3,872	57.19	1,329.00	94.62	76.46	50.56	3.75	13.23	1.62	10.32
Portland-Vancouver-Salem, OR-WA CSA (2019)	283	4,060	42.81	0.00	95.30	71.73	N/A	3.26	19.79	1.44	8.48
Limited Review:											
Total	661	7,932	100.00	1,329	94.98	74.43	50.56	3.49	16.04	1.52	9.53

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Louisville) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Full Review:																			
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2017-2018)	2,677	460,220	64.52	42,802	4.17	2.24	3.08	13.88	10.09	12.49	44.67	41.09	43.74	37.22	46.47	40.61	0.06	0.11	0.09
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2019)	1,472	268,413	35.48	N/A	4.17	2.51	N/A	13.88	9.44	N/A	44.67	38.32	N/A	37.22	49.73	N/A	0.06	0.00	N/A
Limited Review:																			
Total	4,149	728,633	100.00	42,802	4.17	2.34	3.08	13.88	9.86	12.49	44.67	40.11	43.74	37.22	47.63	40.61	0.06	0.07	0.09

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Louisville) 2017-2019																			
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Full Review:																			
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2017-2018)	2,677	460,220	64.52	42,802	20.99	8.63	14.05	17.30	20.40	18.82	19.92	19.39	19.05	41.79	38.14	32.01	0.00	13.45	16.08
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2019)	1,472	268,413	35.48	N/A	20.99	8.97	N/A	17.30	20.45	N/A	19.92	22.21	N/A	41.79	43.61	N/A	0.00	4.76	N/A
Limited Review:																			
Total	4,149	728,633	100.00	42,802	20.99	9.76	14.05	17.30	22.77	18.82	19.92	22.75	19.05	41.79	44.72	32.01	0.00	10.36	16.08

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Louisville) 2017-2019

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	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	
Full Review:																				
Louisville/Jefferson County- Elizabethtown-Bardstown, KY-IN CSA (2017-2018)	6,069	125,978	57.15	21,893	7.16	4.55	6.84	15.09	10.94	15.49	34.97	31.14	32.89	39.00	51.41	41.84	3.77	1.96	2.94	
Louisville/Jefferson County- Elizabethtown-Bardstown, KY-IN CSA (2019)	4,550	73,188	42.85	N/A	7.07	4.77	N/A	14.84	10.57	N/A	35.03	31.69	N/A	39.51	50.81	N/A	3.55	2.15	N/A	
Limited Review:																				
Total	10,619	199,166	100.00	21,893	7.11	4.64	6.84	14.96	10.78	15.49	35.00	31.38	32.89	39.27	51.15	41.84	3.65	2.04	2.94	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Louisville) 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Louisville/Jefferson County- Elizabethtown-Bardstown, KY-IN CSA (2017-2018)	6,069	125,978	57.15	21,893	82.03	68.25	46.37	6.48	19.41	11.49	12.34
Louisville/Jefferson County- Elizabethtown-Bardstown, KY-IN CSA (2019)	4,550	73,188	42.85	N/A	83.75	70.02	N/A	5.62	21.49	10.63	8.48
Limited Review:											
Total	10,619	199,166	100.00	21,893	82.95	69.01	46.37	6.02	20.30	11.03	10.69

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Louisville) 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2017-2018)	88	664	54.32	251	2.89	0.00	0.40	8.60	4.55	1.99	48.27	39.77	54.18	39.75	55.68	43.03	0.48	0.00	0.40	
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2019)	74	641	45.68	N/A	2.82	0.00	N/A	9.22	4.05	N/A	48.28	51.35	N/A	39.25	44.59	N/A	0.44	0.00	N/A	
Limited Review:																				
Total	162	1,305	100.00	251	2.85	0.00	0.40	8.92	4.32	1.99	48.28	45.06	54.18	39.49	50.62	43.03	0.46	0.00	0.40	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Louisville) 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2017-2018)	88	664	54.32	251.00	96.78	73.86	27.49	1.89	6.82	1.33	19.32
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (2019)	74	641	45.68	0.00	97.04	75.68	N/A	1.72	6.76	1.24	17.57
Limited Review:											
Total	162	1,305	100.00	251	96.92	74.69	27.49	1.80	6.79	1.28	18.52

Table O: Assessment Area Distribution of Home Mortgage Loans By Income Category of the Geography - Multi State (Cincinnati) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	2,717	478,544	63.38	70,371	4.16	3.17	3.38	14.30	12.44	13.61	42.29	40.41	43.28	39.15	43.87	39.59	0.10	0.11	0.13	
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	1,570	313,903	36.62	N/A	4.16	2.99	N/A	14.30	12.42	N/A	42.29	37.96	N/A	39.15	46.43	N/A	0.10	0.19	N/A	
Limited Review:																				
Total	4,287	792,447	100.00	70,371	4.16	3.10	3.38	14.30	12.43	13.61	42.29	39.51	43.28	39.15	44.81	39.59	0.10	0.14	0.13	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Cincinnati) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	2,717	478,544	63.38	70,371	21.90	9.57	9.79	16.36	21.72	19.75	19.79	18.51	20.62	41.95	38.46	36.20	0.00	11.74	13.64	
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	1,570	313,903	36.62	N/A	21.90	8.85	N/A	16.36	21.15	N/A	19.79	19.43	N/A	41.95	46.11	N/A	0.00	4.46	N/A	
Limited Review:																				
Total	4,287	792,447	100.00	70,371	21.90	10.24	9.79	16.36	23.65	19.75	19.79	20.73	20.62	41.95	45.38	36.20	0.00	9.07	13.64	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Cincinnati) 2017-2019

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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	6,742	131,462	56.12	36,123	7.15	4.79	6.87	19.22	14.55	17.69	35.70	34.26	34.10	36.91	45.89	40.55	1.02	0.50	0.80	
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	5,272	78,137	43.88	N/A	7.00	4.48	N/A	17.70	12.94	N/A	35.70	33.76	N/A	38.59	48.48	N/A	1.01	0.34	N/A	
Limited Review:																				
Total	12,014	209,599	100.00	36,123	7.08	4.65	6.87	18.42	13.84	17.69	35.70	34.04	34.10	37.79	47.03	40.55	1.01	0.43	0.80	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Cincinnati) 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	6,742	131,462	56.12	36,123	80.53	66.49	48.02	6.92	18.94	12.55	14.57
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	5,272	78,137	43.88	N/A	82.36	69.65	N/A	6.15	19.69	11.49	10.66
Limited Review:											
Total	12,014	209,599	100.00	36,123	81.50	67.88	48.02	6.52	19.27	11.99	12.85

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Cincinnati) 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	56	414	62.22	227	3.41	0.00	0.44	13.65	7.14	5.73	50.38	51.79	56.39	32.35	41.07	37.44	0.21	0.00	0.00	
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	34	355	37.78	N/A	3.61	0.00	N/A	12.75	11.76	N/A	48.59	44.12	N/A	34.86	44.12	N/A	0.19	0.00	N/A	
Limited Review:																				
Total	90	769	100.00	227	3.52	0.00	0.44	13.18	8.89	5.73	49.44	48.89	56.39	33.67	42.22	37.44	0.20	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Multi State (Cincinnati) 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2017-2018)	56	414	62.22	227.00	95.95	71.43	58.59	1.99	8.93	2.05	19.64
Cincinnati-Wilmington-Maysville, OH-KY-IN CSA (2019)	34	355	37.78	N/A	96.23	61.76	N/A	1.82	5.88	1.95	32.35
Limited Review:											
Total	90	769	100.00	227	96.10	67.78	58.59	1.90	7.78	2.00	24.44

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Wheeling) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
48540 Wheeling, WV-OH MSA	206	20,970	100.00	2,782	0.00	0.00	0.00	11.99	6.31	10.32	68.79	70.87	66.10	19.21	22.82	23.58	0.00	0.00	0.00	
Limited Review:																				
Total	206	20,970	100.00	2,782	0.00	0.00	0.00	11.99	6.31	10.32	68.79	70.87	66.10	19.21	22.82	23.58	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Wheeling) 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
48540 Wheeling, WV-OH MSA	206	20,970	100.00	2,782	19.14	9.22	9.85	19.31	20.39	21.89	20.88	22.33	22.90	40.67	21.84	33.79	0.00	26.21	11.57	
Limited Review:																				
Total	206	20,970	100.00	2,782	19.14	12.50	9.85	19.31	27.63	21.89	20.88	30.26	22.90	40.67	29.61	33.79	0.00	26.21	11.57	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Multi State (Wheeling)																			2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate		
Full Review:																					
48540 Wheeling, WV-OH MSA	617	11,583	100.00	1,599	0.00	0.00	0.00	21.29	25.28	25.64	59.44	53.81	55.35	19.27	20.91	19.01	0.00	0.00	0.00		
Limited Review:																					
Total	617	11,583	100.00	1,599	0.00	0.00	0.00	21.29	25.28	25.64	59.44	53.81	55.35	19.27	20.91	19.01	0.00	0.00	0.00		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Multi State (Wheeling)												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
48540 Wheeling, WV-OH MSA	617	11,583	100.00	1,599	78.42	60.29	36.27	6.27	29.98	15.31	9.72		
Limited Review:													
Total	617	11,583	100.00	1,599	78.42	60.29	36.27	6.27	29.98	15.31	9.72		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Multi State (Wheeling) 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
48540 Wheeling, WV-OH MSA	9	56	100.00	27	0.00	0.00	0.00	8.30	0.00	3.70	72.08	55.56	85.19	19.62	44.44	11.11	0.00	0.00	0.00	
Limited Review:																				
Total	9	56	100.00	27	0.00	0.00	0.00	8.30	0.00	3.70	72.08	55.56	85.19	19.62	44.44	11.11	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -Multi State (Wheeling) 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
48540 Wheeling, WV-OH MSA	9	56	100.00	27.00	96.98	88.89	48.15	1.51	0.00	1.51	11.11
Limited Review:											
Total	9	56	100.00	27	96.98	88.89	48.15	1.51	0.00	1.51	11.11

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Arizona																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
38060 Phoenix-Mesa-Chandler, AZ MSA	34,228	8,746,730	77.75	212,812	4.46	2.85	3.69	19.63	14.71	15.78	37.14	34.59	39.82	38.75	47.58	40.18	0.02	0.28	0.53	
99999 Tucson-Nogales, AZ CSA	5,210	1,030,204	11.83	36,775	4.73	3.07	3.66	21.42	16.31	15.98	32.87	28.39	33.21	40.96	52.21	47.13	0.02	0.02	0.01	
Limited Review:																				
22380 Flagstaff, AZ MSA	637	192,098	1.45	4,488	3.51	0.00	0.07	18.21	6.91	10.07	35.60	34.85	37.21	42.68	58.24	52.52	0.00	0.00	0.13	
29420 Lake Havasu City-Kingman, AZ MSA	968	169,261	2.20	8,627	0.00	0.00	0.00	9.22	2.17	3.19	72.31	72.31	72.38	18.47	25.52	24.43	0.00	0.00	0.00	
39150 Prescott Valley-Prescott, AZ MSA	1,537	360,138	3.49	10,742	0.00	0.00	0.00	18.72	13.08	16.85	61.16	61.29	65.26	20.12	25.63	17.89	0.00	0.00	0.00	
43420 Sierra Vista-Douglas, AZ MSA	195	27,425	0.44	3,559	2.32	1.54	2.25	26.56	26.15	24.45	44.17	34.87	38.30	26.95	37.44	35.01	0.00	0.00	0.00	
49740 Yuma, AZ MSA	375	60,043	0.85	5,964	0.00	0.00	0.00	25.72	26.40	17.99	46.95	34.67	42.05	27.33	38.93	39.91	0.00	0.00	0.05	
99999 AZ Non-Metro Roll-up	872	151,546	1.98	7,173	0.82	0.00	0.01	24.70	10.55	10.29	45.25	45.87	48.18	29.22	43.58	41.52	0.00	0.00	0.00	
Total	44,022	10,737,445	99.99	290,140	3.79	2.59	3.20	20.04	14.52	15.40	39.56	35.85	41.08	36.60	46.83	39.92	0.02	0.22	0.39	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Arizona																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
38060 Phoenix-Mesa-Chandler, AZ MSA	34,228	8,746,730	77.75	212,812	21.94	7.54	5.24	17.29	20.16	16.55	19.51	20.08	20.87	41.26	46.74	39.14	0.00	5.48	18.21	
99999 Tucson-Nogales, AZ CSA	5,210	1,030,204	11.83	36,775	22.19	6.76	5.26	17.33	18.46	14.90	19.11	19.52	19.62	41.37	49.17	39.46	0.00	6.08	20.76	
Limited Review:																				
22380 Flagstaff, AZ MSA	637	192,098	1.45	4,488	23.97	2.20	3.85	15.64	11.30	14.17	17.18	18.05	21.39	43.21	65.31	47.62	0.00	3.14	12.97	
29420 Lake Havasu City-Kingman, AZ MSA	968	169,261	2.20	8,627	18.48	5.68	4.09	19.29	13.74	12.69	22.22	21.90	18.86	40.00	54.65	47.85	0.00	4.03	16.51	
39150 Prescott Valley-Prescott, AZ MSA	1,537	360,138	3.49	10,742	18.79	4.42	6.00	19.29	16.66	14.89	22.35	23.36	22.88	39.56	51.14	41.60	0.00	4.42	14.63	
43420 Sierra Vista-Douglas, AZ MSA	195	27,425	0.44	3,559	23.06	4.62	8.88	16.02	15.90	15.20	19.86	21.03	17.98	41.05	44.10	34.31	0.00	14.36	23.63	
49740 Yuma, AZ MSA	375	60,043	0.85	5,964	20.03	5.60	3.44	19.14	13.33	13.50	19.58	20.27	20.09	41.26	46.40	40.17	0.00	14.40	22.80	
99999 AZ Non-Metro Roll-up	872	151,546	1.98	7,173	22.21	3.21	2.37	17.00	7.91	8.25	18.75	16.28	16.76	42.03	61.24	55.81	0.00	11.35	16.81	
Total	44,022	10,737,445	99.99	290,140	21.75	7.54	5.15	17.43	20.41	15.84	19.58	21.28	20.58	41.23	50.78	40.03	0.00	5.68	18.39	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Arizona																		2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
38060 Phoenix-Mesa-Chandler, AZ MSA	65,420	1,266,393	78.09	108,647	6.44	4.60	6.79	16.70	13.88	16.92	29.59	27.73	27.93	46.74	53.29	47.80	0.53	0.50	0.57	
99999 Tucson-Nogales, AZ CSA	9,547	183,888	11.40	17,564	6.25	5.28	6.27	23.33	19.39	24.14	29.63	28.32	29.20	39.76	46.33	39.38	1.02	0.68	1.00	
Limited Review:																				
22380 Flagstaff, AZ MSA	1,412	26,863	1.69	2,750	0.33	0.00	0.15	19.86	20.11	20.87	31.81	27.90	30.95	46.13	50.71	47.64	1.87	1.27	0.40	
29420 Lake Havasu City-Kingman, AZ MSA	1,515	29,722	1.81	3,671	0.00	0.00	0.00	4.52	1.98	4.88	72.07	74.98	73.85	23.41	23.04	21.27	0.00	0.00	0.00	
39150 Prescott Valley-Prescott, AZ MSA	3,068	60,719	3.66	5,532	0.00	0.00	0.00	23.30	19.98	23.10	50.38	48.79	51.01	26.32	31.23	25.89	0.00	0.00	0.00	
43420 Sierra Vista-Douglas, AZ MSA	523	9,442	0.62	1,375	4.00	2.49	3.85	29.98	21.61	27.42	41.58	40.73	41.60	24.44	35.18	27.13	0.00	0.00	0.00	
49740 Yuma, AZ MSA	751	14,236	0.90	1,917	0.00	0.00	0.00	29.41	23.83	28.48	38.62	41.81	38.34	31.96	34.35	33.18	0.01	0.00	0.00	
99999 AZ Non-Metro Roll-up	1,542	31,212	1.84	3,317	0.17	0.00	0.00	20.41	17.90	22.13	47.25	46.24	47.15	32.16	35.86	30.72	0.00	0.00	0.00	
Total	83,778	1,622,475	100.01	144,773	5.59	4.21	5.89	18.26	14.83	18.17	32.27	29.97	30.90	43.31	50.50	44.48	0.57	0.49	0.55	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Arizona												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
38060 Phoenix-Mesa-Chandler, AZ MSA	65,420	1,266,393	78.09	108,647	87.83	69.61	46.46	4.31	18.80	7.86	11.59		
99999 Tucson-Nogales, AZ CSA	9,547	183,888	11.40	17,564	87.62	68.63	46.15	3.72	19.39	8.66	11.98		
Limited Review:													
22380 Flagstaff, AZ MSA	1,412	26,863	1.69	2,750	82.62	72.45	46.33	4.77	14.31	12.61	13.24		
29420 Lake Havasu City-Kingman, AZ MSA	1,515	29,722	1.81	3,671	85.86	66.60	48.92	4.25	20.73	9.88	12.67		
39150 Prescott Valley-Prescott, AZ MSA	3,068	60,719	3.66	5,532	89.23	74.28	50.98	3.32	14.34	7.45	11.38		
43420 Sierra Vista-Douglas, AZ MSA	523	9,442	0.62	1,375	84.36	69.22	48.51	3.12	18.74	12.52	12.05		
49740 Yuma, AZ MSA	751	14,236	0.90	1,917	80.15	67.91	45.23	5.58	18.51	14.27	13.58		
99999 AZ Non-Metro Roll-up	1,542	31,212	1.84	3,317	80.40	64.46	44.65	4.97	24.12	14.63	11.41		
Total	83,778	1,622,475	100.01	144,773	87.34	69.55	46.62	4.20	18.75	8.46	11.69		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Arizona																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
38060 Phoenix-Mesa-Chandler, AZ MSA	456	5,148	65.52	484	5.65	1.54	2.27	20.59	15.35	22.11	31.74	30.92	38.02	41.68	50.22	37.19	0.34	1.97	0.41	
99999 Tucson-Nogales, AZ CSA	56	507	8.05	75	4.82	0.00	1.33	22.80	21.43	13.33	34.23	33.93	41.33	37.91	44.64	44.00	0.23	0.00	0.00	
Limited Review:																				
22380 Flagstaff, AZ MSA	9	66	1.29	22	0.00	0.00	0.00	17.13	0.00	0.00	30.39	55.56	59.09	51.93	44.44	40.91	0.55	0.00	0.00	
29420 Lake Havasu City-Kingman, AZ MSA	10	105	1.44	13	0.00	0.00	0.00	5.90	0.00	15.38	78.23	100.00	84.62	15.87	0.00	0.00	0.00	0.00	0.00	
39150 Prescott Valley-Prescott, AZ MSA	38	291	5.46	49	0.00	0.00	0.00	20.85	23.68	20.41	53.53	36.84	46.94	25.62	39.47	32.65	0.00	0.00	0.00	
43420 Sierra Vista-Douglas, AZ MSA	28	330	4.02	81	1.20	0.00	0.00	11.03	10.71	7.41	73.86	85.71	90.12	13.91	3.57	2.47	0.00	0.00	0.00	
49740 Yuma, AZ MSA	51	531	7.33	85	0.00	0.00	0.00	19.73	5.88	16.47	52.88	64.71	55.29	27.40	29.41	28.24	0.00	0.00	0.00	
99999 AZ Non-Metro Roll-up	48	637	6.90	85	0.00	0.00	0.00	13.38	25.00	18.82	39.92	33.33	32.94	46.71	41.67	48.24	0.00	0.00	0.00	
Total	696	7,615	100.01	894	4.40	1.01	1.34	19.84	15.66	18.46	37.01	37.64	45.86	38.49	44.40	34.12	0.26	1.29	0.22	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Arizona												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
38060 Phoenix-Mesa-Chandler, AZ MSA	456	5,148	65.52	484.00	93.99	71.27	37.60	3.96	15.57	2.05	13.16		
99999 Tucson-Nogales, AZ CSA	56	507	8.05	75.00	96.27	66.07	46.67	2.58	10.71	1.15	23.21		
Limited Review:													
22380 Flagstaff, AZ MSA	9	66	1.29	22.00	92.82	100.00	50.00	2.76	0.00	4.42	0.00		
29420 Lake Havasu City-Kingman, AZ MSA	10	105	1.44	13.00	97.05	100.00	69.23	1.85	0.00	1.11	0.00		
39150 Prescott Valley-Prescott, AZ MSA	38	291	5.46	49.00	96.29	89.47	65.31	1.77	0.00	1.94	10.53		
43420 Sierra Vista-Douglas, AZ MSA	28	330	4.02	81.00	97.12	89.29	40.74	1.44	3.57	1.44	7.14		
49740 Yuma, AZ MSA	51	531	7.33	85.00	78.90	68.63	29.41	12.60	21.57	8.49	9.80		
99999 AZ Non-Metro Roll-up	48	637	6.90	85.00	94.69	68.75	47.06	3.40	20.83	1.91	10.42		
Total	696	7,615	100.01	894	94.17	72.99	41.05	3.72	14.22	2.10	12.79		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - California																			2017-2019																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Full Review:																						12540 Bakersfield, CA MSA (2017-2018)	1,083	231,420	0.64	22,501	5.57	2.77	3.94	15.79	11.36	11.53	32.32	28.35	31.43	46.21	57.53	52.35	0.12	0.00	0.74	12540 Bakersfield, CA MSA (2019)	529	117,277	0.31	N/A	5.57	3.97	N/A	15.79	11.72	N/A	32.32	27.98	N/A	46.21	56.14	N/A	0.12	0.19	N/A	99999 Los Angeles-Long Beach, CA CSA (2017-2018)	51,461	33,929,077	30.42	463,577	2.57	3.13	2.87	18.58	18.18	18.89	30.83	25.76	31.13	47.94	52.57	46.76	0.08	0.35	0.35	99999 Los Angeles-Long Beach, CA CSA (2019)	28,496	20,824,213	16.84	N/A	2.57	3.12	N/A	18.58	18.44	N/A	30.83	25.25	N/A	47.94	52.80	N/A	0.08	0.39	N/A	99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	30,769	21,297,096	18.19	249,106	3.94	4.44	4.84	16.99	16.35	18.34	37.38	34.85	37.07	41.61	44.19	39.59	0.08	0.17	0.15	99999 San Jose-San Francisco-Oakland, CA CSA (2019)	16,792	12,579,752	9.93	N/A	3.94	4.95	N/A	16.99	16.82	N/A	37.38	34.96	N/A	41.61	43.04	N/A	0.08	0.21	N/A	Limited Review:																						17020 Chico, CA MSA (2017-2018)	293	83,228	0.17	6,382	0.89	2.73	1.47	20.25	16.38	15.51	51.64	43.34	49.26	27.22	37.54	33.75	0.00	0.00	0.00	17020 Chico, CA MSA (2019)	279	74,434	0.16	N/A	0.89	1.08	N/A	20.25	19.35	N/A	51.64	30.47	N/A	27.22	49.10	N/A	0.00	0.00	N/A	20940 El Centro, CA MSA (2017-2018)	182	30,491	0.11	3,285	0.00	0.00	0.00	33.55	25.82	27.91	25.53	18.68	20.09	40.81	55.49	51.78	0.12	0.00	0.21	20940 El Centro, CA MSA (2019)	99	18,038	0.06	N/A	0.00	0.00	N/A	33.55	26.26	N/A	25.53	17.17	N/A	40.81	56.57	N/A	0.12	0.00	N/A	99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	1,961	441,352	1.16	39,013	2.30	1.02	1.65	22.91	18.26	19.79	26.00	24.07	24.82	48.78	56.65	53.73	0.00	0.00	0.02	99999 Fresno-Madera-Hanford, CA CSA (2019)	1,055	255,748	0.62	N/A	2.30	1.33	N/A	22.91	17.63	N/A	26.00	20.28	N/A	48.78	60.76	N/A	0.00	0.00	N/A	99999 Modesto-Merced, CA CSA (2017-2018)	1,539	338,522	0.91	24,261	1.33	1.30	1.52	20.00	14.42	20.63	40.07	41.20	41.56	38.59	43.08	36.30	0.00	0.00	0.00	99999 Modesto-Merced, CA CSA (2019)	925	222,428	0.55	N/A	1.33	1.51	N/A	20.00	15.24	N/A	40.07	39.89	N/A	38.59	43.35	N/A	0.00	0.00	N/A	99999 Redding-Red Bluff, CA CSA (2017-2018)	374	77,505	0.22	7,610	0.00	0.00	0.00	20.86	17.65	18.40	58.39	54.28	59.05	20.75	28.07	22.55	0.00	0.00	0.00	99999 Redding-Red Bluff, CA CSA (2019)	185	40,655	0.11	N/A	0.00	0.00	N/A	20.86	20.00	N/A	58.39	58.92	N/A	20.75	21.08	N/A	0.00	0.00	N/A	99999 Sacramento-Roseville, CA CSA (2017-2018)	6,678	2,825,679	3.95	96,466	4.12	3.92	5.73	17.49	14.23	18.46	34.31	29.40	32.83	44.05	52.40	42.95	0.04	0.06	0.04	99999 Sacramento-Roseville, CA CSA (2019)	3,676	1,728,777	2.17	N/A	4.12	4.11	N/A	17.49	12.98	N/A	34.31	28.92	N/A	44.05	53.94	N/A	0.04	0.05	N/A	41500 Salinas, CA MSA	1,566	926,539	0.93	8,772	0.57	0.70	0.64	15.31	11.69	17.00	33.88	26.37	35.16	50.22	61.17	47.04	0.02	0.06	0.17	41740 San Diego-Chula Vista-Carlsbad, CA MSA	17,266	10,392,747	10.21	94,818	2.79	4.13	3.43	15.14	15.00	16.07	35.45	29.84	34.48	46.62	51.03	46.03	0.00	0.00	0.00	42020 San Luis Obispo-Paso Robles, CA MSA	1,358	632,754	0.80	8,438	0.00	0.00	0.00	9.26	9.65	10.64	71.74	68.56	73.65	18.51	21.28	15.47	0.48	0.52	0.24	42200 Santa Maria-Santa Barbara, CA MSA	1,694	1,299,236	1.00	9,327	3.09	2.66	4.41	15.58	14.46	19.49	34.11	23.02	35.53	47.23	59.86	40.52	0.00	0.00	0.05	99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	124	22,785	0.07	3,463	1.29	3.23	0.84	22.86	15.32	14.87	25.81	29.84	31.56	50.04	51.61	52.73	0.00	0.00	0.00	99999 Visalia-Porterville-Hanford, CA CSA (2019)	57	10,625	0.03	N/A	1.29	1.75	N/A	22.86	10.53	N/A	25.81	21.05	N/A	50.04	66.67	N/A	0.00	0.00	N/A	99999 CA Non-Metro Roll-up (2017-2018)	444	102,531	0.26	7,759	2.87	1.35	3.39	24.12	19.14	20.97	54.86	53.83	56.30	18.15	25.68	19.35	0.00	0.00	0.00	99999 CA Non-Metro Roll-up (2019)	282	68,776	0.17	N/A	2.87	1.77	N/A	24.12	17.73	N/A	54.86	47.52	N/A	18.15	32.98	N/A	0.00	0.00	N/A	Total	169,167	108,571,685	99.99	1,044,778	3.03	3.56	3.53	18.17	16.89	18.31	33.98	29.62	33.91	44.75	49.70	44.04	0.07	0.23	0.22
12540 Bakersfield, CA MSA (2017-2018)	1,083	231,420	0.64	22,501	5.57	2.77	3.94	15.79	11.36	11.53	32.32	28.35	31.43	46.21	57.53	52.35	0.12	0.00	0.74																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
12540 Bakersfield, CA MSA (2019)	529	117,277	0.31	N/A	5.57	3.97	N/A	15.79	11.72	N/A	32.32	27.98	N/A	46.21	56.14	N/A	0.12	0.19	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	51,461	33,929,077	30.42	463,577	2.57	3.13	2.87	18.58	18.18	18.89	30.83	25.76	31.13	47.94	52.57	46.76	0.08	0.35	0.35																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Los Angeles-Long Beach, CA CSA (2019)	28,496	20,824,213	16.84	N/A	2.57	3.12	N/A	18.58	18.44	N/A	30.83	25.25	N/A	47.94	52.80	N/A	0.08	0.39	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	30,769	21,297,096	18.19	249,106	3.94	4.44	4.84	16.99	16.35	18.34	37.38	34.85	37.07	41.61	44.19	39.59	0.08	0.17	0.15																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	16,792	12,579,752	9.93	N/A	3.94	4.95	N/A	16.99	16.82	N/A	37.38	34.96	N/A	41.61	43.04	N/A	0.08	0.21	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Limited Review:																						17020 Chico, CA MSA (2017-2018)	293	83,228	0.17	6,382	0.89	2.73	1.47	20.25	16.38	15.51	51.64	43.34	49.26	27.22	37.54	33.75	0.00	0.00	0.00	17020 Chico, CA MSA (2019)	279	74,434	0.16	N/A	0.89	1.08	N/A	20.25	19.35	N/A	51.64	30.47	N/A	27.22	49.10	N/A	0.00	0.00	N/A	20940 El Centro, CA MSA (2017-2018)	182	30,491	0.11	3,285	0.00	0.00	0.00	33.55	25.82	27.91	25.53	18.68	20.09	40.81	55.49	51.78	0.12	0.00	0.21	20940 El Centro, CA MSA (2019)	99	18,038	0.06	N/A	0.00	0.00	N/A	33.55	26.26	N/A	25.53	17.17	N/A	40.81	56.57	N/A	0.12	0.00	N/A	99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	1,961	441,352	1.16	39,013	2.30	1.02	1.65	22.91	18.26	19.79	26.00	24.07	24.82	48.78	56.65	53.73	0.00	0.00	0.02	99999 Fresno-Madera-Hanford, CA CSA (2019)	1,055	255,748	0.62	N/A	2.30	1.33	N/A	22.91	17.63	N/A	26.00	20.28	N/A	48.78	60.76	N/A	0.00	0.00	N/A	99999 Modesto-Merced, CA CSA (2017-2018)	1,539	338,522	0.91	24,261	1.33	1.30	1.52	20.00	14.42	20.63	40.07	41.20	41.56	38.59	43.08	36.30	0.00	0.00	0.00	99999 Modesto-Merced, CA CSA (2019)	925	222,428	0.55	N/A	1.33	1.51	N/A	20.00	15.24	N/A	40.07	39.89	N/A	38.59	43.35	N/A	0.00	0.00	N/A	99999 Redding-Red Bluff, CA CSA (2017-2018)	374	77,505	0.22	7,610	0.00	0.00	0.00	20.86	17.65	18.40	58.39	54.28	59.05	20.75	28.07	22.55	0.00	0.00	0.00	99999 Redding-Red Bluff, CA CSA (2019)	185	40,655	0.11	N/A	0.00	0.00	N/A	20.86	20.00	N/A	58.39	58.92	N/A	20.75	21.08	N/A	0.00	0.00	N/A	99999 Sacramento-Roseville, CA CSA (2017-2018)	6,678	2,825,679	3.95	96,466	4.12	3.92	5.73	17.49	14.23	18.46	34.31	29.40	32.83	44.05	52.40	42.95	0.04	0.06	0.04	99999 Sacramento-Roseville, CA CSA (2019)	3,676	1,728,777	2.17	N/A	4.12	4.11	N/A	17.49	12.98	N/A	34.31	28.92	N/A	44.05	53.94	N/A	0.04	0.05	N/A	41500 Salinas, CA MSA	1,566	926,539	0.93	8,772	0.57	0.70	0.64	15.31	11.69	17.00	33.88	26.37	35.16	50.22	61.17	47.04	0.02	0.06	0.17	41740 San Diego-Chula Vista-Carlsbad, CA MSA	17,266	10,392,747	10.21	94,818	2.79	4.13	3.43	15.14	15.00	16.07	35.45	29.84	34.48	46.62	51.03	46.03	0.00	0.00	0.00	42020 San Luis Obispo-Paso Robles, CA MSA	1,358	632,754	0.80	8,438	0.00	0.00	0.00	9.26	9.65	10.64	71.74	68.56	73.65	18.51	21.28	15.47	0.48	0.52	0.24	42200 Santa Maria-Santa Barbara, CA MSA	1,694	1,299,236	1.00	9,327	3.09	2.66	4.41	15.58	14.46	19.49	34.11	23.02	35.53	47.23	59.86	40.52	0.00	0.00	0.05	99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	124	22,785	0.07	3,463	1.29	3.23	0.84	22.86	15.32	14.87	25.81	29.84	31.56	50.04	51.61	52.73	0.00	0.00	0.00	99999 Visalia-Porterville-Hanford, CA CSA (2019)	57	10,625	0.03	N/A	1.29	1.75	N/A	22.86	10.53	N/A	25.81	21.05	N/A	50.04	66.67	N/A	0.00	0.00	N/A	99999 CA Non-Metro Roll-up (2017-2018)	444	102,531	0.26	7,759	2.87	1.35	3.39	24.12	19.14	20.97	54.86	53.83	56.30	18.15	25.68	19.35	0.00	0.00	0.00	99999 CA Non-Metro Roll-up (2019)	282	68,776	0.17	N/A	2.87	1.77	N/A	24.12	17.73	N/A	54.86	47.52	N/A	18.15	32.98	N/A	0.00	0.00	N/A	Total	169,167	108,571,685	99.99	1,044,778	3.03	3.56	3.53	18.17	16.89	18.31	33.98	29.62	33.91	44.75	49.70	44.04	0.07	0.23	0.22																																																																																																																																														
17020 Chico, CA MSA (2017-2018)	293	83,228	0.17	6,382	0.89	2.73	1.47	20.25	16.38	15.51	51.64	43.34	49.26	27.22	37.54	33.75	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
17020 Chico, CA MSA (2019)	279	74,434	0.16	N/A	0.89	1.08	N/A	20.25	19.35	N/A	51.64	30.47	N/A	27.22	49.10	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
20940 El Centro, CA MSA (2017-2018)	182	30,491	0.11	3,285	0.00	0.00	0.00	33.55	25.82	27.91	25.53	18.68	20.09	40.81	55.49	51.78	0.12	0.00	0.21																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
20940 El Centro, CA MSA (2019)	99	18,038	0.06	N/A	0.00	0.00	N/A	33.55	26.26	N/A	25.53	17.17	N/A	40.81	56.57	N/A	0.12	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	1,961	441,352	1.16	39,013	2.30	1.02	1.65	22.91	18.26	19.79	26.00	24.07	24.82	48.78	56.65	53.73	0.00	0.00	0.02																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Fresno-Madera-Hanford, CA CSA (2019)	1,055	255,748	0.62	N/A	2.30	1.33	N/A	22.91	17.63	N/A	26.00	20.28	N/A	48.78	60.76	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Modesto-Merced, CA CSA (2017-2018)	1,539	338,522	0.91	24,261	1.33	1.30	1.52	20.00	14.42	20.63	40.07	41.20	41.56	38.59	43.08	36.30	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Modesto-Merced, CA CSA (2019)	925	222,428	0.55	N/A	1.33	1.51	N/A	20.00	15.24	N/A	40.07	39.89	N/A	38.59	43.35	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Redding-Red Bluff, CA CSA (2017-2018)	374	77,505	0.22	7,610	0.00	0.00	0.00	20.86	17.65	18.40	58.39	54.28	59.05	20.75	28.07	22.55	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Redding-Red Bluff, CA CSA (2019)	185	40,655	0.11	N/A	0.00	0.00	N/A	20.86	20.00	N/A	58.39	58.92	N/A	20.75	21.08	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Sacramento-Roseville, CA CSA (2017-2018)	6,678	2,825,679	3.95	96,466	4.12	3.92	5.73	17.49	14.23	18.46	34.31	29.40	32.83	44.05	52.40	42.95	0.04	0.06	0.04																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Sacramento-Roseville, CA CSA (2019)	3,676	1,728,777	2.17	N/A	4.12	4.11	N/A	17.49	12.98	N/A	34.31	28.92	N/A	44.05	53.94	N/A	0.04	0.05	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
41500 Salinas, CA MSA	1,566	926,539	0.93	8,772	0.57	0.70	0.64	15.31	11.69	17.00	33.88	26.37	35.16	50.22	61.17	47.04	0.02	0.06	0.17																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
41740 San Diego-Chula Vista-Carlsbad, CA MSA	17,266	10,392,747	10.21	94,818	2.79	4.13	3.43	15.14	15.00	16.07	35.45	29.84	34.48	46.62	51.03	46.03	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
42020 San Luis Obispo-Paso Robles, CA MSA	1,358	632,754	0.80	8,438	0.00	0.00	0.00	9.26	9.65	10.64	71.74	68.56	73.65	18.51	21.28	15.47	0.48	0.52	0.24																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
42200 Santa Maria-Santa Barbara, CA MSA	1,694	1,299,236	1.00	9,327	3.09	2.66	4.41	15.58	14.46	19.49	34.11	23.02	35.53	47.23	59.86	40.52	0.00	0.00	0.05																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	124	22,785	0.07	3,463	1.29	3.23	0.84	22.86	15.32	14.87	25.81	29.84	31.56	50.04	51.61	52.73	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 Visalia-Porterville-Hanford, CA CSA (2019)	57	10,625	0.03	N/A	1.29	1.75	N/A	22.86	10.53	N/A	25.81	21.05	N/A	50.04	66.67	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 CA Non-Metro Roll-up (2017-2018)	444	102,531	0.26	7,759	2.87	1.35	3.39	24.12	19.14	20.97	54.86	53.83	56.30	18.15	25.68	19.35	0.00	0.00	0.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
99999 CA Non-Metro Roll-up (2019)	282	68,776	0.17	N/A	2.87	1.77	N/A	24.12	17.73	N/A	54.86	47.52	N/A	18.15	32.98	N/A	0.00	0.00	N/A																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
Total	169,167	108,571,685	99.99	1,044,778	3.03	3.56	3.53	18.17	16.89	18.31	33.98	29.62	33.91	44.75	49.70	44.04	0.07	0.23	0.22																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, N/A 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 - California																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-income Borrowers			Moderate Income Borrowers			Middle-income Borrowers			Upper-income Borrowers			Not Available-income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
12540 Bakersfield, CA MSA (2017-2018)	1,083	231,420	0.64	22,501	24.82	3.79	3.48	16.42	10.53	11.24	16.07	22.16	21.26	42.69	53.74	42.19	0.00	9.79	21.83	
12540 Bakersfield, CA MSA (2019)	529	117,277	0.31	N/A	24.82	1.70	N/A	16.42	12.10	N/A	16.07	17.39	N/A	42.69	64.27	N/A	0.00	4.54	N/A	
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	51,461	33,929,077	30.42	463,577	23.93	2.61	3.30	16.47	7.81	7.65	17.60	13.57	16.32	42.00	60.48	54.85	0.00	15.54	17.89	
99999 Los Angeles-Long Beach, CA CSA (2019)	28,496	20,824,213	16.84	N/A	23.93	2.19	N/A	16.47	7.82	N/A	17.60	15.08	N/A	42.00	59.36	N/A	0.00	15.56	N/A	
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	30,769	21,297,096	18.19	249,106	23.89	2.77	3.74	16.19	8.14	9.45	18.42	15.33	18.25	41.50	66.47	56.29	0.00	7.30	12.27	
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	16,792	12,579,752	9.93	N/A	23.89	2.67	N/A	16.19	10.18	N/A	18.42	17.54	N/A	41.50	62.58	N/A	0.00	7.03	N/A	
Limited Review:																				
17020 Chico, CA MSA (2017-2018)	293	83,228	0.17	6,382	22.86	4.44	4.40	16.75	8.87	12.00	19.02	19.45	20.03	41.38	58.02	50.25	0.00	9.22	13.32	
17020 Chico, CA MSA (2019)	279	74,434	0.16	N/A	22.86	4.66	N/A	16.75	11.47	N/A	19.02	20.43	N/A	41.38	60.93	N/A	0.00	2.51	N/A	
20940 El Centro, CA MSA (2017-2018)	182	30,491	0.11	3,285	24.06	2.20	1.89	17.04	10.44	6.21	15.69	17.58	16.65	43.22	52.20	52.63	0.00	17.58	22.62	
20940 El Centro, CA MSA (2019)	99	18,038	0.06	N/A	24.06	6.06	N/A	17.04	16.16	N/A	15.69	13.13	N/A	43.22	55.56	N/A	0.00	9.09	N/A	
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	1,961	441,352	1.16	39,013	24.45	3.16	2.78	16.52	11.17	8.79	16.72	16.11	18.21	42.31	59.26	48.97	0.00	10.30	21.25	
99999 Fresno-Madera-Hanford, CA CSA (2019)	1,055	255,748	0.62	N/A	24.45	2.84	N/A	16.52	11.47	N/A	16.72	17.16	N/A	42.31	64.08	N/A	0.00	4.45	N/A	
99999 Modesto-Merced, CA CSA (2017-2018)	1,539	338,522	0.91	24,261	22.89	3.25	2.53	17.21	11.89	8.42	18.30	22.16	20.68	41.59	56.53	51.35	0.00	6.17	17.02	
99999 Modesto-Merced, CA CSA (2019)	925	222,428	0.55	N/A	22.89	4.22	N/A	17.21	13.84	N/A	18.30	24.43	N/A	41.59	54.70	N/A	0.00	2.81	N/A	
99999 Redding-Red Bluff, CA CSA (2017-2018)	374	77,505	0.22	7,610	22.51	5.88	3.82	18.76	17.11	14.30	19.55	19.79	21.35	39.17	44.92	45.45	0.00	12.30	15.07	
99999 Redding-Red Bluff, CA CSA (2019)	185	40,655	0.11	N/A	22.51	3.78	N/A	18.76	10.81	N/A	19.55	25.95	N/A	39.17	51.35	N/A	0.00	8.11	N/A	
99999 Sacramento-Roseville, CA CSA (2017-2018)	6,678	2,825,679	3.95	96,466	23.27	3.82	4.15	16.24	12.52	13.16	18.33	17.95	21.97	42.16	58.66	46.56	0.00	7.05	14.16	
99999 Sacramento-Roseville, CA CSA (2019)	3,676	1,728,777	2.17	N/A	23.27	3.48	N/A	16.24	12.19	N/A	18.33	19.48	N/A	42.16	58.38	N/A	0.00	6.47	N/A	
41500 Salinas, CA MSA	1,566	926,539	0.93	8,772	21.55	1.28	2.28	17.89	6.26	5.86	18.66	12.77	14.80	41.89	71.20	62.04	0.00	8.49	15.03	
41740 San Diego-Chula Vista-Carlsbad, CA MSA	17,266	10,392,747	10.21	94,818	23.58	2.83	2.64	16.93	9.19	7.57	17.82	16.32	18.53	41.67	62.42	55.74	0.00	9.26	15.52	
42020 San Luis Obispo-Paso Robles, CA MSA	1,358	632,754	0.80	8,438	21.03	2.72	2.95	18.20	8.17	7.94	20.17	17.53	19.08	40.59	64.06	57.64	0.00	7.51	12.38	
42200 Santa Maria-Santa Barbara, CA MSA	1,694	1,299,236	1.00	9,327	23.39	2.07	3.14	16.80	5.79	9.91	18.20	12.34	19.14	41.61	68.18	53.26	0.00	11.63	14.55	
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	124	22,785	0.07	3,463	23.26	3.23	2.22	17.04	16.13	9.24	17.77	12.90	20.07	41.92	44.35	41.73	0.00	23.39	26.74	
99999 Visalia-Porterville-Hanford, CA CSA (2019)	57	10,625	0.03	N/A	23.26	7.02	N/A	17.04	7.02	N/A	17.77	17.54	N/A	41.92	61.40	N/A	0.00	7.02	N/A	
99999 CA Non-Metro Roll-up (2017-2018)	444	102,531	0.26	7,759	24.65	4.95	4.51	18.91	10.59	11.35	19.24	19.37	21.70	37.20	55.41	49.50	0.00	9.68	12.93	
99999 CA Non-Metro Roll-up (2019)	282	68,776	0.17	N/A	24.65	6.03	N/A	18.91	12.41	N/A	19.24	20.92	N/A	37.20	57.80	N/A	0.00	2.84	N/A	
Total	169,167	108,571,685	99.99	1,044,778	23.84	3.05	3.39	16.49	9.84	8.83	17.85	17.46	17.93	41.82	69.64	53.82	0.00	11.42	16.04	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
 Due to rounding, totals may not equal 100.0

Assessment Area:	Assessment Area Distribution of Loans to Small Businesses By Income Category of the Geography - California															2017-2019			
	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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																			
12540 Bakersfield, CA MSA (2017-2018)	2,900	56,314	0.48	14,368	5.93	3.21	4.32	20.49	14.90	17.63	27.93	20.72	24.64	44.87	60.76	52.42	0.78	0.41	1.00
12540 Bakersfield, CA MSA (2019)	1,957	34,996	0.32	N/A	5.73	3.73	N/A	19.91	13.80	N/A	27.49	20.49	N/A	46.12	61.62	N/A	0.75	0.36	N/A
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	180,075	3,422,776	29.84	591,433	4.91	3.46	4.41	20.52	17.40	19.94	27.65	26.47	27.56	45.36	51.57	46.86	1.56	1.09	1.23
99999 Los Angeles-Long Beach, CA CSA (2019)	130,681	2,222,672	21.66	N/A	4.72	3.63	N/A	19.94	17.54	N/A	27.18	26.65	N/A	46.64	51.01	N/A	1.52	1.17	N/A
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	99,887	1,541,475	16.55	260,985	8.79	6.50	7.91	18.59	16.48	18.65	33.19	33.86	33.72	38.95	42.67	39.30	0.48	0.50	0.42
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	71,366	1,017,173	11.83	N/A	8.66	6.50	N/A	18.40	16.81	N/A	32.93	34.30	N/A	39.50	41.89	N/A	0.51	0.51	N/A
Limited Review:																			
17020 Chico, CA MSA (2017-2018)	945	18,690	0.16	4,304	1.26	1.80	1.18	26.17	23.28	23.00	47.11	39.26	44.12	25.47	35.66	31.69	0.00	0.00	0.00
17020 Chico, CA MSA (2019)	649	12,112	0.11	N/A	1.44	1.69	N/A	26.96	27.73	N/A	44.90	35.44	N/A	26.70	35.13	N/A	0.00	0.00	N/A
20940 El Centro, CA MSA (2017-2018)	292	5,255	0.05	2,258	0.00	0.00	0.00	42.53	28.42	37.60	26.87	25.68	31.18	30.30	45.89	31.13	0.31	0.00	0.09
20940 El Centro, CA MSA (2019)	220	4,209	0.04	N/A	0.00	0.00	N/A	41.96	24.55	N/A	26.88	28.64	N/A	30.89	45.91	N/A	0.27	0.91	N/A
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	4,066	73,406	0.67	25,852	4.67	2.36	3.58	28.27	17.90	24.61	24.15	19.77	24.95	42.00	59.49	46.09	0.90	0.47	0.77
99999 Fresno-Madera-Hanford, CA CSA (2019)	3,209	57,470	0.53	N/A	4.63	2.52	N/A	27.25	17.23	N/A	23.76	19.69	N/A	43.47	60.05	N/A	0.89	0.50	N/A
99999 Modesto-Merced, CA CSA (2017-2018)	1,994	33,445	0.33	12,911	1.84	1.76	1.55	29.50	22.07	24.82	34.54	33.30	37.50	34.13	42.88	36.14	0.00	0.00	0.00
99999 Modesto-Merced, CA CSA (2019)	1,554	21,253	0.26	N/A	1.80	1.16	N/A	28.80	22.33	N/A	34.68	32.75	N/A	34.72	43.76	N/A	0.00	0.00	N/A
99999 Redding-Red Bluff, CA CSA (2017-2018)	944	11,718	0.16	4,521	0.00	0.00	0.00	26.47	20.87	22.72	57.03	59.00	60.61	16.50	20.13	16.68	0.00	0.00	0.00
99999 Redding-Red Bluff, CA CSA (2019)	797	11,364	0.13	N/A	0.00	0.00	N/A	25.64	19.32	N/A	58.35	56.34	N/A	16.01	24.34	N/A	0.00	0.00	N/A
99999 Sacramento-Roseville, CA CSA (2017-2018)	17,662	263,608	2.93	60,351	8.42	6.84	7.49	21.24	16.20	19.27	30.87	28.47	29.26	37.75	47.79	43.04	1.72	0.69	0.94
99999 Sacramento-Roseville, CA CSA (2019)	13,279	183,090	2.20	N/A	8.36	6.62	N/A	20.75	16.78	N/A	30.44	28.70	N/A	38.82	47.06	N/A	1.64	0.84	N/A
41500 Salinas, CA MSA	3,431	52,087	0.57	7,510	3.99	2.56	3.34	13.12	9.62	12.48	31.30	26.11	31.45	51.01	61.50	52.50	0.57	0.20	0.23
41740 San Diego-Chula Vista-Carlsbad, CA MSA	55,347	947,775	9.17	98,589	5.48	3.83	4.66	14.91	11.36	13.95	34.93	33.14	34.44	44.51	51.59	46.86	0.17	0.08	0.09
42020 San Luis Obispo-Paso Robles, CA MSA	4,075	66,577	0.68	8,824	0.00	0.00	0.00	20.82	17.10	18.47	58.74	60.42	60.83	19.64	22.26	20.36	0.79	0.22	0.33
42200 Santa Maria-Santa Barbara, CA MSA	5,313	87,428	0.88	11,059	5.51	3.56	4.28	29.42	27.80	29.93	25.75	20.16	25.57	38.81	48.03	39.67	0.52	0.45	0.55
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	129	2,135	0.02	1,493	1.73	1.55	1.74	37.25	28.68	29.34	19.74	17.83	23.78	41.05	51.94	45.14	0.23	0.00	0.00
99999 Visalia-Porterville-Hanford, CA CSA (2019)	164	3,362	0.03	N/A	1.58	1.22	N/A	35.84	27.44	N/A	19.74	15.24	N/A	42.64	56.10	N/A	0.20	0.00	N/A
99999 CA Non-Metro Roll-up (2017-2018)	1,389	17,532	0.23	6,065	4.69	3.96	4.30	29.87	26.64	28.23	51.82	50.54	51.90	13.62	18.86	15.56	0.00	0.00	0.00
99999 CA Non-Metro Roll-up (2019)	1,055	13,814	0.17	N/A	4.39	4.08	N/A	30.31	25.97	N/A	51.25	50.43	N/A	14.05	19.53	N/A	0.00	0.00	N/A
Total	603,380	10,181,736	100.00	1,110,523	5.96	4.49	5.28	20.11	16.73	19.36	30.11	29.67	30.33	42.71	48.31	44.17	1.10	0.79	0.85

Source: 2015 ACS; 01/01/2017-12/31/2019 Bank Data, 2019 HMDA Aggregate Data, N/A data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - California											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
12540 Bakersfield, CA MSA (2017-2018)	2,900	56,314	0.48	14,368	84.41	66.52	39.40	4.92	18.76	10.67	14.72	
12540 Bakersfield, CA MSA (2019)	1,957	34,996	0.32	N/A	85.66	71.64	N/A	4.43	19.37	9.90	8.99	
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	180,075	3,422,776	29.84	591,433	86.64	69.09	46.84	5.85	17.00	7.51	13.91	
99999 Los Angeles-Long Beach, CA CSA (2019)	130,681	2,222,672	21.66	N/A	88.56	73.88	N/A	4.84	18.29	6.60	7.82	
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	99,887	1,541,475	16.55	260,985	85.88	70.61	46.59	5.98	13.76	8.14	15.64	
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	71,366	1,017,173	11.83	N/A	87.34	73.84	N/A	5.12	15.22	7.54	10.94	
Limited Review:												
17020 Chico, CA MSA (2017-2018)	945	18,690	0.16	4,304	85.43	65.82	48.37	4.47	18.31	10.10	15.87	
17020 Chico, CA MSA (2019)	649	12,112	0.11	N/A	86.32	64.10	N/A	4.21	21.42	9.47	14.48	
20940 El Centro, CA MSA (2017-2018)	292	5,255	0.05	2,258	75.40	67.81	46.55	6.46	15.07	18.14	17.12	
20940 El Centro, CA MSA (2019)	220	4,209	0.04	N/A	77.05	70.00	N/A	5.80	18.18	17.14	11.82	
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	4,066	73,406	0.67	25,852	83.42	64.24	41.01	5.68	17.54	10.90	18.22	
99999 Fresno-Madera-Hanford, CA CSA (2019)	3,209	57,470	0.53	N/A	84.72	69.80	N/A	5.01	19.76	10.27	10.44	
99999 Modesto-Merced, CA CSA (2017-2018)	1,994	33,445	0.33	12,911	83.58	62.84	47.33	5.25	20.76	11.18	16.40	
99999 Modesto-Merced, CA CSA (2019)	1,554	21,253	0.26	N/A	85.06	66.02	N/A	4.70	21.75	10.24	12.23	
99999 Redding-Red Bluff, CA CSA (2017-2018)	944	11,718	0.16	4,521	84.86	67.58	50.06	4.82	16.63	10.32	15.78	
99999 Redding-Red Bluff, CA CSA (2019)	797	11,364	0.13	N/A	85.97	69.39	N/A	4.26	19.82	9.78	10.79	
99999 Sacramento-Roseville, CA CSA (2017-2018)	17,662	263,608	2.93	60,351	85.69	70.34	46.07	4.80	15.46	9.51	14.20	
99999 Sacramento-Roseville, CA CSA (2019)	13,279	183,090	2.20	N/A	87.22	73.56	N/A	4.10	16.67	8.67	9.77	
41500 Salinas, CA MSA	3,431	52,087	0.57	7,510	85.29	65.23	45.25	5.08	20.26	9.63	14.51	
41740 San Diego-Chula Vista-Carlsbad, CA MSA	55,347	947,775	9.17	98,589	88.78	72.26	45.51	4.47	15.74	6.75	12.00	
42020 San Luis Obispo-Paso Robles, CA MSA	4,075	66,577	0.68	8,824	87.38	68.71	41.70	4.54	17.13	8.08	14.16	
42200 Santa Maria-Santa Barbara, CA MSA	5,313	87,428	0.88	11,059	84.67	67.04	40.36	6.03	18.39	9.31	14.57	
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	129	2,135	0.02	1,493	81.13	67.44	46.16	4.75	19.38	14.12	13.18	
99999 Visalia-Porterville-Hanford, CA CSA (2019)	164	3,362	0.03	N/A	82.70	62.20	N/A	4.24	19.51	13.05	18.29	
99999 CA Non-Metro Roll-up (2017-2018)	1,389	17,532	0.23	6,065	82.27	69.55	45.01	4.99	15.98	12.74	14.47	
99999 CA Non-Metro Roll-up (2019)	1,055	13,814	0.17	N/A	83.43	70.33	N/A	4.62	18.20	11.95	11.47	
Total	603,380	10,181,736	100.00	1,110,523	87.09	71.25	46.29	5.23	16.47	7.68	12.28	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "N/A" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - California																			2017-2019	
Assessment Area:	Total Loans to Farms			Low-income Tracts			Moderate Income Tracts			Middle-income Tracts			Upper-income Tracts			Not Available-income Tracts				
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
12540 Bakersfield, CA MSA (2017-2018)	94	2,204	2.02	235	4.38	3.19	3.40	20.97	13.83	17.87	32.76	34.04	36.17	39.93	48.94	42.13	1.95	0.00	0.43	
12540 Bakersfield, CA MSA (2019)	61	866	1.31	N/A	4.50	0.00	N/A	20.90	24.59	N/A	32.16	26.23	N/A	40.30	49.18	N/A	2.14	0.00	N/A	
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	575	6,097	12.37	1,085	3.69	5.57	5.25	20.62	15.13	17.51	32.47	27.48	33.09	42.66	50.43	43.32	0.56	1.39	0.83	
99999 Los Angeles-Long Beach, CA CSA (2019)	433	5,280	9.31	N/A	3.71	3.00	N/A	20.69	15.70	N/A	31.70	29.33	N/A	43.26	51.73	N/A	0.64	0.23	N/A	
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	652	6,588	14.02	1,669	4.30	1.38	1.20	17.24	12.73	11.98	40.11	43.10	40.38	38.28	42.48	46.38	0.08	0.31	0.06	
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	500	6,167	10.75	N/A	4.86	2.40	N/A	17.45	15.20	N/A	39.63	43.80	N/A	37.96	38.60	N/A	0.10	0.00	N/A	
Limited Review:																				
17020 Chico, CA MSA (2017-2018)	43	557	0.92	174	0.63	0.00	0.57	17.02	20.93	14.37	42.33	30.23	44.25	40.02	48.84	40.80	0.00	0.00	0.00	
17020 Chico, CA MSA (2019)	37	357	0.80	N/A	0.83	0.00	N/A	17.88	16.22	N/A	41.37	35.14	N/A	39.92	48.65	N/A	0.00	0.00	N/A	
20940 El Centro, CA MSA (2017-2018)	19	189	0.41	115	0.00	0.00	0.00	23.90	31.58	20.00	26.75	10.53	26.09	48.31	57.89	53.91	1.04	0.00	0.00	
20940 El Centro, CA MSA (2019)	18	265	0.39	N/A	0.00	0.00	N/A	22.03	5.56	N/A	26.84	27.78	N/A	50.38	66.67	N/A	0.76	0.00	N/A	
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	325	4,625	6.99	1,185	2.42	0.92	1.69	28.99	27.69	32.57	31.60	31.38	29.45	36.92	40.00	36.29	0.07	0.00	0.00	
99999 Fresno-Madera-Hanford, CA CSA (2019)	227	3,075	4.88	N/A	2.64	0.00	N/A	29.28	30.40	N/A	30.10	25.99	N/A	37.93	43.61	N/A	0.05	0.00	N/A	
99999 Modesto-Merced, CA CSA (2017-2018)	194	2,281	4.17	862	0.37	0.00	0.93	17.29	6.19	13.69	42.12	44.33	44.32	40.22	49.48	41.07	0.00	0.00	0.00	
99999 Modesto-Merced, CA CSA (2019)	153	1,714	3.29	N/A	0.33	0.00	N/A	17.51	6.54	N/A	41.85	43.79	N/A	40.31	49.67	N/A	0.00	0.00	N/A	
99999 Redding-Red Bluff, CA CSA (2017-2018)	38	258	0.82	142	0.00	0.00	0.00	26.67	21.05	30.28	61.86	63.16	66.20	11.48	15.79	3.52	0.00	0.00	0.00	
99999 Redding-Red Bluff, CA CSA (2019)	22	247	0.47	N/A	0.00	0.00	N/A	26.42	13.64	N/A	62.03	59.09	N/A	11.55	27.27	N/A	0.00	0.00	N/A	
99999 Sacramento-Roseville, CA CSA (2017-2018)	238	2,221	5.12	720	3.97	1.68	1.81	15.40	12.61	8.89	36.15	31.93	34.03	44.11	52.94	55.14	0.37	0.84	0.14	
99999 Sacramento-Roseville, CA CSA (2019)	183	1,804	3.94	N/A	4.21	1.09	N/A	15.95	14.21	N/A	34.23	31.15	N/A	45.26	53.55	N/A	0.36	0.00	N/A	
41500 Salinas, CA MSA	90	1,167	1.94	159	1.01	0.00	1.26	16.31	12.22	14.47	41.20	53.33	53.46	41.01	34.44	30.82	0.46	0.00	0.00	
41740 San Diego-Chula Vista-Carlsbad, CA MSA	324	3,346	6.97	288	3.93	1.85	1.04	17.66	9.57	13.89	37.69	41.05	39.24	40.71	46.91	45.49	0.00	0.62	0.35	
42020 San Luis Obispo-Paso Robles, CA MSA	110	1,160	2.37	206	0.00	0.00	0.00	10.07	15.45	8.74	71.73	57.27	70.87	16.69	27.27	19.42	1.51	0.00	0.97	
42200 Santa Maria-Santa Barbara, CA MSA	123	1,604	2.65	200	4.43	0.00	5.50	17.87	15.45	16.50	24.34	22.76	29.00	53.03	61.79	48.50	0.33	0.00	0.50	
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	24	262	0.52	131	2.28	0.00	0.00	17.91	8.33	9.16	25.04	25.00	22.14	54.63	66.67	68.70	0.15	0.00	0.00	
99999 Visalia-Porterville-Hanford, CA CSA (2019)	33	496	0.71	N/A	2.27	0.00	N/A	16.79	12.12	N/A	26.32	33.33	N/A	54.46	54.55	N/A	0.15	0.00	N/A	
99999 CA Non-Metro Roll-up (2017-2018)	69	732	1.48	229	1.36	2.90	2.18	26.31	36.23	27.51	57.39	53.62	59.83	14.94	7.25	10.48	0.00	0.00	0.00	
99999 CA Non-Metro Roll-up (2019)	65	849	1.40	N/A	1.22	1.54	N/A	28.07	33.85	N/A	56.07	56.92	N/A	14.64	7.69	N/A	0.00	0.00	N/A	
Total	4,650	54,411	100.02	7,400	3.44	1.87	2.00	19.90	16.98	17.30	36.64	36.84	38.69	39.78	44.99	41.80	0.36	0.32	0.22	

Source: 2016 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "N/A" data not available.
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - California											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
12540 Bakersfield, CA MSA (2017-2018)	94	2,204	2.02	235.00	87.20	53.19	38.30	9.54	29.79	3.26	17.02	
12540 Bakersfield, CA MSA (2019)	61	866	1.31	N/A	87.70	54.10	N/A	9.06	37.70	3.23	8.20	
99999 Los Angeles-Long Beach, CA CSA (2017-2018)	575	6,097	12.37	1,085.00	93.05	66.43	46.54	4.23	18.78	2.71	14.78	
99999 Los Angeles-Long Beach, CA CSA (2019)	433	5,280	9.31	0.00	93.83	64.90	N/A	3.66	23.33	2.51	11.78	
99999 San Jose-San Francisco-Oakland, CA CSA (2017-2018)	652	6,588	14.02	1,669.00	93.05	65.49	48.29	4.93	16.87	2.02	17.64	
99999 San Jose-San Francisco-Oakland, CA CSA (2019)	500	6,167	10.75	0.00	93.75	69.20	N/A	4.28	18.40	1.97	12.40	
Limited Review:												
17020 Chico, CA MSA (2017-2018)	43	557	0.92	174.00	93.59	60.47	63.79	4.73	30.23	1.68	9.30	
17020 Chico, CA MSA (2019)	37	357	0.80	N/A	94.07	72.97	N/A	4.47	27.03	1.46	0.00	
20940 El Centro, CA MSA (2017-2018)	19	189	0.41	115.00	76.36	52.63	38.26	20.26	47.37	3.38	0.00	
20940 El Centro, CA MSA (2019)	18	265	0.39	N/A	77.22	55.56	N/A	19.75	27.78	3.04	16.67	
99999 Fresno-Madera-Hanford, CA CSA (2017-2018)	325	4,625	6.99	1,185.00	88.91	61.23	41.52	9.04	24.00	2.05	14.77	
99999 Fresno-Madera-Hanford, CA CSA (2019)	227	3,075	4.88	0.00	88.84	61.23	N/A	8.97	26.43	2.18	12.33	
99999 Modesto-Merced, CA CSA (2017-2018)	194	2,281	4.17	862.00	88.89	60.82	47.91	8.70	23.20	2.41	15.98	
99999 Modesto-Merced, CA CSA (2019)	153	1,714	3.29	0.00	89.65	58.17	N/A	8.15	30.07	2.20	11.76	
99999 Redding-Red Bluff, CA CSA (2017-2018)	38	258	0.82	142.00	94.75	78.95	54.93	2.51	13.16	2.73	7.89	
99999 Redding-Red Bluff, CA CSA (2019)	22	247	0.47	0.00	94.55	72.73	N/A	2.57	27.27	2.89	0.00	
99999 Sacramento-Roseville, CA CSA (2017-2018)	238	2,221	5.12	720.00	94.15	73.11	59.31	3.79	9.24	2.06	17.65	
99999 Sacramento-Roseville, CA CSA (2019)	183	1,804	3.94	0.00	94.38	70.49	N/A	3.59	16.94	2.03	12.57	
41500 Salinas, CA MSA	90	1,167	1.94	159.00	82.30	50.00	48.43	13.55	33.33	4.15	16.67	
41740 San Diego-Chula Vista-Carlsbad, CA MSA	324	3,346	6.97	288.00	94.88	76.85	54.51	3.22	11.42	1.90	11.73	
42020 San Luis Obispo-Paso Robles, CA MSA	110	1,160	2.37	206.00	94.30	79.09	50.00	4.03	11.82	1.68	9.09	
42200 Santa Maria-Santa Barbara, CA MSA	123	1,604	2.65	200.00	89.67	58.54	40.00	7.30	27.64	3.03	13.82	
99999 Visalia-Porterville-Hanford, CA CSA (2017-2018)	24	262	0.52	131.00	88.77	62.50	48.85	9.56	12.50	1.67	25.00	
99999 Visalia-Porterville-Hanford, CA CSA (2019)	33	496	0.71	N/A	88.35	36.36	N/A	9.53	48.48	2.12	15.15	
99999 CA Non-Metro Roll-up (2017-2018)	69	732	1.48	229.00	94.92	72.46	49.78	3.11	11.59	1.97	15.94	
99999 CA Non-Metro Roll-up (2019)	65	849	1.40	0.00	95.95	89.23	N/A	2.31	10.77	1.73	0.00	
Total	4,650	54,411	100.02	7,400	92.52	66.11	48.12	5.18	20.22	2.29	13.68	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Colorado																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Full Review:																					
99999 Denver-Aurora, CO CSA (2017-2018)	19,226	6,881,084	55.18	187,342	4.32	4.97	4.51	18.74	19.02	18.97	36.01	31.92	35.46	40.93	44.09	41.04	0.00	0.01	0.02		
99999 Denver-Aurora, CO CSA (2019)	10,296	4,231,999	29.55	N/A	4.32	4.14	N/A	18.74	16.89	N/A	36.01	31.52	N/A	40.93	47.46	N/A	0.00	0.00	N/A		
Limited Review:																					
17820 Colorado Springs, CO MSA (2017-2018)	1,937	513,917	5.56	38,032	3.31	1.50	2.67	20.67	14.20	19.40	42.22	39.24	44.37	33.81	45.07	33.55	0.00	0.00	0.00		
17820 Colorado Springs, CO MSA (2019)	970	273,770	2.78	N/A	3.31	2.78	N/A	20.67	14.64	N/A	42.22	35.26	N/A	33.81	47.32	N/A	0.00	0.00	N/A		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	117	255,184	0.34	849	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	100.00	0.00	0.00	0.00		
99999 Edwards-Glenwood Springs, CO CSA (2019)	64	215,566	0.18	N/A	0.00	0.00	N/A	0.00	0.00	N/A	0.00	0.00	N/A	100.00	100.00	N/A	0.00	0.00	N/A		
22660 Fort Collins, CO MSA (2017-2018)	1,424	422,064	4.09	17,554	1.51	0.56	1.31	20.52	20.86	21.43	52.73	43.12	47.36	25.24	35.46	29.90	0.00	0.00	0.00		
22660 Fort Collins, CO MSA (2019)	808	268,914	2.32	N/A	1.51	0.62	N/A	20.52	19.31	N/A	52.73	42.95	N/A	25.24	37.13	N/A	0.00	0.00	N/A		
Total	34,842	13,062,498	100.00	243,777	3.93	4.16	3.97	19.08	17.98	19.15	38.05	32.85	37.59	38.94	45.00	39.28	0.00	0.01	0.01		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Colorado																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate		
Full Review:																					
99999 Denver-Aurora, CO CSA (2017-2018)	19,226	6,881,084	55.18	187,342	21.32	6.05	6.20	17.51	21.58	18.45	20.45	20.94	23.47	40.71	48.09	36.56	0.00	3.33	15.33		
99999 Denver-Aurora, CO CSA (2019)	10,296	4,231,999	29.55	N/A	21.32	5.96	N/A	17.51	21.63	N/A	20.45	19.49	N/A	40.71	49.37	N/A	0.00	3.55	N/A		
Limited Review:																					
17820 Colorado Springs, CO MSA (2017-2018)	1,937	513,917	5.56	38,032	20.37	5.52	5.36	18.47	17.55	19.95	20.32	26.28	23.69	40.84	45.64	33.14	0.00	5.01	17.86		
17820 Colorado Springs, CO MSA (2019)	970	273,770	2.78	N/A	20.37	6.60	N/A	18.47	16.19	N/A	20.32	24.23	N/A	40.84	51.24	N/A	0.00	1.75	N/A		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	117	255,184	0.34	849	9.36	0.00	2.36	9.72	3.42	4.83	11.84	10.26	12.01	69.08	57.26	62.54	0.00	29.06	18.26		
99999 Edwards-Glenwood Springs, CO CSA (2019)	64	215,566	0.18	N/A	9.36	0.00	N/A	9.72	0.00	N/A	11.84	6.25	N/A	69.08	50.00	N/A	0.00	43.75	N/A		
22660 Fort Collins, CO MSA (2017-2018)	1,424	422,064	4.09	17,554	20.52	5.20	6.11	17.23	17.84	17.04	22.62	23.46	23.62	39.64	50.28	39.07	0.00	3.23	14.16		
22660 Fort Collins, CO MSA (2019)	808	268,914	2.32	N/A	20.52	4.95	N/A	17.23	17.20	N/A	22.62	21.66	N/A	39.64	53.47	N/A	0.00	2.72	N/A		
Total	34,842	13,062,498	100.00	243,777	21.07	6.14	6.05	17.62	21.64	18.53	20.57	21.74	23.48	40.74	50.48	36.29	0.00	3.59	15.65		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Colorado																			2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate		
Full Review:																					
99999 Denver-Aurora, CO CSA (2017-2018)	41,425	647,813	47.74	101,557	6.23	5.60	7.15	19.17	17.00	19.78	33.48	31.15	32.23	40.84	46.02	40.54	0.29	0.24	0.30		
99999 Denver-Aurora, CO CSA (2019)	30,736	467,137	35.42	N/A	6.18	5.60	N/A	19.11	17.03	N/A	33.35	31.32	N/A	41.10	45.85	N/A	0.27	0.20	N/A		
Limited Review:																					
17820 Colorado Springs, CO MSA (2017-2018)	3,988	58,792	4.60	14,605	7.39	7.32	7.56	23.32	19.28	22.67	33.14	28.69	33.19	35.98	44.66	36.51	0.18	0.05	0.07		
17820 Colorado Springs, CO MSA (2019)	3,154	40,304	3.63	N/A	7.18	6.88	N/A	23.19	19.28	N/A	33.04	27.62	N/A	36.43	46.23	N/A	0.17	0.00	N/A		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	382	5,333	0.44	1,256	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	100.00	0.00	0.00	0.00		
99999 Edwards-Glenwood Springs, CO CSA (2019)	339	4,064	0.39	N/A	0.00	0.00	N/A	0.00	0.00	N/A	0.00	0.00	N/A	100.00	100.00	N/A	0.00	0.00	N/A		
22660 Fort Collins, CO MSA (2017-2018)	3,956	58,892	4.56	10,180	3.11	3.67	4.69	28.49	25.91	27.36	42.88	38.68	40.56	25.51	31.75	27.40	0.01	0.00	0.00		
22660 Fort Collins, CO MSA (2019)	2,800	41,278	3.23	N/A	2.97	3.96	N/A	27.81	27.00	N/A	42.69	38.93	N/A	26.52	30.11	N/A	0.01	0.00	N/A		
Total	86,780	1,323,613	100.01	127,598	6.04	5.54	6.93	20.18	17.78	20.52	33.82	31.30	32.69	39.72	45.19	39.62	0.24	0.19	0.24		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Colorado												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Denver-Aurora, CO CSA (2017-2018)	41,425	647,813	47.74	101,557	88.66	71.62	48.14	4.23	15.24	7.12	13.13		
99999 Denver-Aurora, CO CSA (2019)	30,736	467,137	35.42	N/A	90.13	74.36	N/A	3.46	16.77	6.41	8.88		
Limited Review:													
17820 Colorado Springs, CO MSA (2017-2018)	3,988	58,792	4.60	14,605	88.69	71.11	52.49	3.44	15.70	7.87	13.19		
17820 Colorado Springs, CO MSA (2019)	3,154	40,304	3.63	N/A	90.20	74.32	N/A	2.84	17.15	6.95	8.53		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	382	5,333	0.44	1,256	87.05	66.75	44.82	4.94	18.32	8.00	14.92		
99999 Edwards-Glenwood Springs, CO CSA (2019)	339	4,064	0.39	N/A	87.99	75.81	N/A	4.09	14.75	7.92	9.44		
22660 Fort Collins, CO MSA (2017-2018)	3,956	58,892	4.56	10,180	89.09	72.70	47.33	3.56	14.46	7.35	12.84		
22660 Fort Collins, CO MSA (2019)	2,800	41,278	3.23	N/A	90.49	72.96	N/A	2.94	18.71	6.57	8.32		
Total	86,780	1,323,613	100.01	127,598	89.48	72.75	48.54	3.68	15.96	6.84	11.29		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Colorado																			2017-2019																		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts																				
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Denver-Aurora, CO CSA (2017-2018)	336	4,053	40.73	974	5.98	1.19	1.75	18.21	11.90	11.19	38.28	45.83	54.41	37.32	41.07	32.65	0.21	0.00	0.00																		
99999 Denver-Aurora, CO CSA (2019)	287	3,569	34.79	N/A	6.29	6.27	N/A	18.32	8.71	N/A	37.03	42.16	N/A	38.04	42.86	N/A	0.32	0.00	N/A																		
Limited Review:																																					
17820 Colorado Springs, CO MSA (2017-2018)	34	256	4.12	73	5.93	2.94	1.37	20.99	2.94	10.96	43.03	26.47	32.88	29.92	67.65	54.79	0.14	0.00	0.00																		
17820 Colorado Springs, CO MSA (2019)	34	324	4.12	N/A	6.97	2.94	N/A	20.67	0.00	N/A	42.13	41.18	N/A	30.17	55.88	N/A	0.06	0.00	N/A																		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	7	61	0.85	8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	100.00	0.00	0.00	0.00																		
99999 Edwards-Glenwood Springs, CO CSA (2019)	4	63	0.48	N/A	0.00	0.00	N/A	0.00	0.00	N/A	0.00	0.00	N/A	100.00	100.00	N/A	0.00	0.00	N/A																		
22660 Fort Collins, CO MSA (2017-2018)	75	576	9.09	154	4.08	1.33	1.30	19.35	12.00	7.14	46.64	44.00	51.95	29.86	42.67	39.61	0.08	0.00	0.00																		
22660 Fort Collins, CO MSA (2019)	48	541	5.82	N/A	4.22	4.17	N/A	19.01	6.25	N/A	46.39	41.67	N/A	30.32	47.92	N/A	0.07	0.00	N/A																		
Total	825	9,443	100.00	1,209	5.90	3.27	1.65	18.51	9.45	10.59	38.88	42.55	52.44	36.49	44.73	35.32	0.22	0.00	0.00																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Colorado												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Denver-Aurora, CO CSA (2017-2018)	336	4,053	40.73	974.00	95.38	76.49	60.06	2.66	9.52	1.95	13.99		
99999 Denver-Aurora, CO CSA (2019)	287	3,569	34.79	0.00	95.78	71.78	N/A	2.44	18.12	1.78	10.10		
Limited Review:													
17820 Colorado Springs, CO MSA (2017-2018)	34	256	4.12	73.00	96.58	82.35	69.86	1.74	2.94	1.67	14.71		
17820 Colorado Springs, CO MSA (2019)	34	324	4.12	N/A	96.88	76.47	N/A	1.62	8.82	1.50	14.71		
99999 Edwards-Glenwood Springs, CO CSA (2017-2018)	7	61	0.85	8.00	94.17	100.00	62.50	5.00	0.00	0.83	0.00		
99999 Edwards-Glenwood Springs, CO CSA (2019)	4	63	0.48	N/A	96.80	100.00	N/A	1.60	0.00	1.60	0.00		
22660 Fort Collins, CO MSA (2017-2018)	75	576	9.09	154.00	96.52	81.33	58.44	1.89	8.00	1.59	10.67		
22660 Fort Collins, CO MSA (2019)	48	541	5.82	N/A	96.72	85.42	N/A	1.74	6.25	1.54	8.33		
Total	825	9,443	100.00	1,209	95.86	76.36	60.46	2.36	11.76	1.79	11.88		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Florida																			2017-2019																		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts																				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	12,554	3,922,572	22.76	182,420	2.48	1.47	2.00	21.98	17.65	19.73	35.42	32.68	37.06	39.99	48.00	40.96	0.14	0.20	0.26																		
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	7,369	2,537,185	13.36	N/A	2.48	1.78	N/A	21.98	18.35	N/A	35.42	30.59	N/A	39.99	48.91	N/A	0.14	0.38	N/A																		
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	6,386	1,309,049	11.58	117,597	0.88	0.67	0.78	19.13	16.14	16.38	47.06	43.08	47.46	32.91	40.10	35.33	0.02	0.00	0.05																		
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	3,605	900,156	6.54	N/A	0.88	0.39	N/A	19.13	14.15	N/A	47.06	40.97	N/A	32.91	44.44	N/A	0.02	0.06	N/A																		
Limited Review:																																					
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	2,361	717,752	4.28	45,270	2.15	0.51	1.51	17.79	16.73	18.83	43.20	36.93	44.16	36.86	45.83	35.50	0.00	0.00	0.00																		
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	1,377	475,805	2.50	N/A	2.15	0.87	N/A	17.79	13.07	N/A	43.20	40.23	N/A	36.86	45.82	N/A	0.00	0.00	N/A																		
99999 Gainesville-Lake City, FL CSA	335	68,132	0.61	6,453	2.42	2.99	3.86	14.90	8.06	11.85	37.49	31.64	35.21	44.58	55.52	48.38	0.62	1.79	0.70																		
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	3,260	798,581	5.91	57,817	3.42	0.64	1.29	19.67	11.50	15.72	41.26	31.44	40.74	35.65	56.41	42.24	0.00	0.00	0.00																		
29460 Lakeland-Winter Haven, FL MSA	1,321	199,962	2.39	24,443	1.31	0.30	0.53	17.30	10.98	13.71	58.80	63.21	62.35	22.57	25.51	23.41	0.01	0.00	0.00																		
99999 North Port-Sarasota, FL CSA (2017-2018)	2,472	610,957	4.48	41,824	0.83	0.32	0.45	16.81	8.54	13.36	54.75	48.06	51.57	27.61	43.08	34.62	0.00	0.00	0.00																		
99999 North Port-Sarasota, FL CSA (2019)	1,435	373,753	2.60	N/A	0.83	0.14	N/A	16.81	11.08	N/A	54.75	45.37	N/A	27.61	43.41	N/A	0.00	0.00	N/A																		
36100 Ocala, FL MSA	736	107,403	1.33	12,017	0.63	0.00	0.12	14.48	8.83	11.32	69.61	75.14	70.52	15.28	16.03	18.05	0.00	0.00	0.00																		
37340 Palm Bay-Melbourne- Titusville, FL MSA	2,048	423,815	3.71	24,399	1.60	0.93	0.80	21.09	14.40	21.56	43.47	39.26	43.19	33.84	45.41	34.46	0.00	0.00	0.00																		
99999 Tallahassee-Bainbridge, FL-GA CSA	443	92,658	0.80	7,109	5.03	3.16	4.47	14.31	8.13	12.72	30.66	29.80	30.54	49.18	57.56	51.05	0.81	1.35	1.22																		
45300 Tampa-St. Petersburg-Clearwater, FL MSA	9,458	2,181,896	17.15	114,768	1.91	1.41	1.58	21.87	15.60	18.20	39.66	34.80	38.87	36.51	48.14	41.30	0.06	0.06	0.05																		
Total	55,160	14,719,676	100.00	634,117	1.93	1.10	1.40	20.19	15.36	17.50	41.83	37.34	42.87	35.97	46.07	38.11	0.08	0.13	0.12																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data. 'N/A' 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 - Florida																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	12,554	3,922,572	22.76	182,420	22.83	3.64	3.30	17.16	12.08	11.03	17.89	16.27	18.91	42.12	54.75	49.15	0.00	13.25	17.61	
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	7,369	2,537,185	13.36	N/A	22.83	2.74	N/A	17.16	11.59	N/A	17.89	18.74	N/A	42.12	61.92	N/A	0.00	5.01	N/A	
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	6,386	1,309,049	11.58	117,597	20.73	4.67	4.32	18.41	14.23	14.11	19.83	18.38	21.12	41.03	45.30	44.12	0.00	17.41	16.33	
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	3,605	900,156	6.54	N/A	20.73	4.55	N/A	18.41	15.92	N/A	19.83	20.75	N/A	41.03	54.87	N/A	0.00	3.91	N/A	
Limited Review:																				
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	2,361	717,752	4.28	45,270	20.78	3.05	3.95	18.20	10.42	14.67	19.53	14.65	20.47	41.49	57.35	44.69	0.00	14.53	16.22	
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	1,377	475,805	2.50	N/A	20.78	2.54	N/A	18.20	13.29	N/A	19.53	17.28	N/A	41.49	61.87	N/A	0.00	5.01	N/A	
99999 Gainesville-Lake City, FL CSA	335	68,132	0.61	6,453	23.41	2.99	6.93	15.40	11.64	18.39	18.20	16.72	18.97	42.99	53.73	41.05	0.00	14.93	14.66	
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	3,260	798,581	5.91	57,817	21.75	4.33	5.50	17.38	11.99	16.51	19.97	14.72	21.01	40.90	50.25	39.03	0.00	18.71	17.95	
29460 Lakeland-Winter Haven, FL MSA	1,321	199,962	2.39	24,443	20.42	2.57	2.99	18.35	9.69	13.06	21.44	17.71	24.80	39.79	40.35	38.85	0.00	29.67	20.30	
99999 North Port-Sarasota, FL CSA (2017-2018)	2,472	610,957	4.48	41,824	19.00	4.61	5.52	19.40	13.47	16.56	21.15	20.71	21.52	40.45	53.28	43.59	0.00	7.93	12.82	
99999 North Port-Sarasota, FL CSA (2019)	1,435	373,753	2.60	N/A	19.00	3.76	N/A	19.40	16.03	N/A	21.15	21.67	N/A	40.45	54.77	N/A	0.00	3.76	N/A	
36100 Ocala, FL MSA	736	107,403	1.33	12,017	19.26	3.67	5.54	19.46	11.14	16.93	21.56	17.80	23.49	39.72	41.44	35.34	0.00	25.95	18.70	
37340 Palm Bay-Melbourne-Titusville, FL MSA	2,048	423,815	3.71	24,399	20.22	5.66	6.33	18.61	14.50	15.80	20.58	18.80	21.14	40.60	53.32	40.26	0.00	7.71	16.46	
99999 Tallahassee-Bainbridge, FL-GA CSA	443	92,658	0.80	7,109	21.11	4.97	4.29	15.57	12.19	15.73	18.35	17.16	17.88	44.97	52.82	41.26	0.00	12.87	20.85	
45300 Tampa-St. Petersburg-Clearwater, FL MSA	9,458	2,181,896	17.15	114,768	21.59	4.54	5.01	17.90	15.23	16.12	19.12	17.74	19.91	41.39	49.63	41.79	0.00	12.87	17.18	
Total	55,160	14,719,676	100.00	634,117	21.64	4.48	4.39	17.79	14.99	14.15	19.06	20.18	20.37	41.51	60.35	44.11	0.00	12.01	17.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Florida																			2017-2019																			
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate																			
Full Review:																																						
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	60,316	1,170,945	27.93	274,100	4.15	3.36	4.33	21.48	18.35	21.33	29.65	28.91	28.37	43.62	48.52	44.76	1.09	0.87	1.21																			
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	45,829	794,452	21.22	N/A	4.14	3.43	N/A	21.62	19.03	N/A	29.65	29.29	N/A	43.45	47.40	N/A	1.14	0.85	N/A																			
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	19,414	319,805	8.99	83,192	1.63	1.00	1.57	24.15	19.73	23.54	38.79	36.74	38.26	35.40	42.51	36.60	0.03	0.02	0.03																			
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	14,895	230,099	6.90	N/A	1.64	1.15	N/A	24.24	19.82	N/A	38.82	36.37	N/A	35.27	42.63	N/A	0.03	0.03	N/A																			
Limited Review:																																						
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	6,103	102,304	2.83	32,715	2.78	1.69	2.38	18.30	13.88	17.87	39.80	38.33	39.24	39.01	46.11	40.50	0.11	0.00	0.01																			
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	4,670	69,715	2.16	N/A	2.67	1.73	N/A	19.05	15.50	N/A	39.68	39.40	N/A	38.50	43.36	N/A	0.11	0.00	N/A																			
99999 Gainesville-Lake City, FL CSA	1,609	18,755	0.74	5,108	7.17	7.33	7.65	16.29	15.48	13.92	36.64	27.84	35.55	39.01	47.48	41.95	0.90	1.86	0.92																			
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	10,414	161,961	4.82	33,369	4.37	2.36	4.17	21.85	16.00	20.76	35.20	30.35	33.64	38.58	51.29	41.43	0.00	0.00	0.00																			
29460 Lakeland-Winter Haven, FL MSA	2,812	39,447	1.30	11,186	3.61	2.88	4.12	20.41	16.15	20.94	52.11	49.25	50.79	23.87	31.72	24.16	0.00	0.00	0.00																			
99999 North Port-Sarasota, FL CSA (2017-2018)	5,904	99,289	2.73	27,986	1.08	0.39	0.93	18.64	13.74	17.72	49.21	45.55	46.40	31.07	40.33	34.95	0.00	0.00	0.00																			
99999 North Port-Sarasota, FL CSA (2019)	4,664	68,801	2.16	N/A	1.08	0.51	N/A	18.70	14.13	N/A	48.36	45.45	N/A	31.85	39.90	N/A	0.00	0.00	N/A																			
36100 Ocala, FL MSA	1,514	19,807	0.70	6,838	1.86	0.99	2.09	16.72	15.32	17.23	64.21	60.63	63.91	17.21	23.05	16.77	0.00	0.00	0.00																			
37340 Palm Bay-Melbourne-Titusville, FL MSA	5,214	87,483	2.41	12,893	2.39	1.75	2.21	23.49	19.87	24.05	39.07	36.75	37.76	35.00	41.64	35.97	0.05	0.00	0.01																			
99999 Tallahassee-Bainbridge, FL-GA CSA	1,293	15,241	0.60	5,773	8.07	6.34	7.03	20.21	17.25	20.01	33.56	30.32	34.38	36.56	42.85	37.33	1.59	3.25	1.25																			
45300 Tampa-St. Petersburg-Clearwater, FL MSA	31,323	519,216	14.50	81,431	3.97	3.09	4.22	20.78	15.52	20.50	35.27	31.86	34.56	39.66	49.30	40.46	0.31	0.23	0.25																			
Total	215,974	3,717,320	99.99	574,591	3.38	2.68	3.61	21.56	17.75	21.05	34.72	32.69	33.68	39.72	46.39	41.03	0.63	0.49	0.64																			

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Florida											
2017-2019											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	60,316	1,170,945	27.93	274,100	90.98	74.86	46.32	3.81	14.80	5.21	10.34
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	45,829	794,452	21.22	N/A	91.94	77.62	N/A	3.26	16.56	4.80	5.83
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	19,414	319,805	8.99	83,192	89.82	74.13	47.76	3.47	14.98	6.71	10.88
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	14,895	230,099	6.90	N/A	91.05	75.82	N/A	2.90	17.28	6.05	6.90
Limited Review:											
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	6,103	102,304	2.83	32,715	90.37	71.69	45.61	3.55	15.39	6.07	12.93
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	4,670	69,715	2.16	N/A	91.38	72.91	N/A	3.07	17.82	5.55	9.27
99999 Gainesville-Lake City, FL CSA	1,609	18,755	0.74	5,108	87.53	73.28	46.28	3.68	15.60	8.79	11.12
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	10,414	161,961	4.82	33,369	88.10	72.54	45.23	4.10	16.30	7.81	11.16
29460 Lakeland-Winter Haven, FL MSA	2,812	39,447	1.30	11,186	89.65	74.04	45.14	3.25	14.83	7.09	11.13
99999 North Port-Sarasota, FL CSA (2017-2018)	5,904	99,289	2.73	27,986	90.53	71.66	49.34	3.50	16.29	5.97	12.04
99999 North Port-Sarasota, FL CSA (2019)	4,664	68,801	2.16	N/A	91.40	75.15	N/A	3.07	16.60	5.53	8.25
36100 Ocala, FL MSA	1,514	19,807	0.70	6,838	89.03	71.40	46.72	3.67	19.48	7.31	9.11
37340 Palm Bay-Melbourne-Titusville, FL MSA	5,214	87,483	2.41	12,893	88.83	73.78	48.46	3.77	15.61	7.40	10.61
99999 Tallahassee-Bainbridge, FL-GA CSA	1,293	15,241	0.60	5,773	86.75	74.86	49.70	3.87	16.32	9.38	8.82
45300 Tampa-St. Petersburg-Clearwater, FL MSA	31,323	519,216	14.50	81,431	89.29	74.54	47.69	3.91	16.00	6.80	9.46
Total	215,974	3,717,320	99.99	574,591	90.79	75.00	46.83	3.47	15.84	5.74	9.16

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Florida																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	354	4,167	22.35	680	4.35	1.69	2.21	23.68	10.17	15.88	32.63	33.62	26.18	38.99	54.24	55.29	0.34	0.28	0.44	
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	297	3,811	18.75	N/A	4.32	1.68	N/A	24.07	11.11	N/A	32.58	25.93	N/A	38.69	61.28	N/A	0.34	0.00	N/A	
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	145	1,429	9.15	289	1.03	0.00	0.69	22.99	11.03	18.69	45.59	45.52	46.02	30.30	43.45	34.26	0.09	0.00	0.35	
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	113	1,402	7.13	N/A	1.03	0.00	N/A	23.19	12.39	N/A	45.55	46.02	N/A	30.13	41.59	N/A	0.11	0.00	N/A	
Limited Review:																				
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	61	576	3.85	149	3.79	1.64	11.41	23.51	11.48	23.49	45.50	42.62	41.61	27.17	44.26	23.49	0.03	0.00	0.00	
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	40	363	2.53	N/A	3.82	0.00	N/A	23.76	20.00	N/A	45.51	45.00	N/A	26.89	35.00	N/A	0.02	0.00	N/A	
99999 Gainesville-Lake City, FL CSA	30	279	1.89	81	3.30	0.00	0.00	12.77	10.00	12.35	50.64	56.67	56.79	33.19	33.33	30.86	0.11	0.00	0.00	
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	64	738	4.04	117	2.91	3.13	2.56	20.12	21.88	21.37	45.57	42.19	49.57	31.40	32.81	26.50	0.00	0.00	0.00	
29460 Lakeland-Winter Haven, FL MSA	62	2,376	3.91	83	2.17	3.23	4.82	17.35	4.84	15.66	58.60	59.68	63.86	21.88	32.26	15.66	0.00	0.00	0.00	
99999 North Port-Sarasota, FL CSA (2017-2018)	45	632	2.84	122	1.52	0.00	0.82	20.72	28.89	25.41	47.86	26.67	26.23	29.89	44.44	47.54	0.00	0.00	0.00	
99999 North Port-Sarasota, FL CSA (2019)	39	566	2.46	N/A	1.73	0.00	N/A	20.69	2.56	N/A	48.24	30.77	N/A	29.34	66.67	N/A	0.00	0.00	N/A	
36100 Ocala, FL MSA	69	772	4.36	89	0.92	0.00	0.00	17.57	21.74	17.98	68.17	62.32	64.04	13.34	15.94	17.98	0.00	0.00	0.00	
37340 Palm Bay-Melbourne-Titusville, FL MSA	37	360	2.34	32	2.39	0.00	0.00	25.53	18.92	21.88	42.29	51.35	31.25	29.79	29.73	46.88	0.00	0.00	0.00	
99999 Tallahassee-Bainbridge, FL-GA CSA	8	71	0.51	15	4.96	0.00	13.33	15.76	0.00	6.67	31.00	25.00	13.33	47.78	75.00	66.67	0.51	0.00	0.00	
45300 Tampa-St. Petersburg-Clearwater, FL MSA	220	2,383	13.89	226	2.48	3.18	1.77	24.41	15.45	22.12	39.80	35.91	38.50	33.20	45.45	37.61	0.11	0.00	0.00	
Total	1,584	19,925	100.00	1,883	2.91	1.45	2.55	22.85	12.88	18.59	41.00	38.26	38.13	33.06	47.35	40.52	0.17	0.06	0.21	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Florida											
2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2017-2018)	354	4,167	22.35	680.00	95.96	76.55	51.18	2.80	12.71	1.24	10.73
99999 Miami-Port St. Lucie-Fort Lauderdale, FL CSA (2019)	297	3,811	18.75	0.00	96.47	77.44	N/A	2.35	13.47	1.17	9.09
99999 Orlando-Lakeland-Deltona, FL CSA (2017-2018)	145	1,429	9.15	289.00	96.10	73.79	52.94	2.43	10.34	1.47	15.86
99999 Orlando-Lakeland-Deltona, FL CSA (2019)	113	1,402	7.13	0.00	96.51	82.30	N/A	2.13	10.62	1.36	7.08
Limited Review:											
99999 Cape Coral-Fort Myers-Naples, FL CSA (2017-2018)	61	576	3.85	149.00	96.07	80.33	49.66	2.51	13.11	1.42	6.56
99999 Cape Coral-Fort Myers-Naples, FL CSA (2019)	40	363	2.53	0.00	96.46	70.00	N/A	2.26	22.50	1.27	7.50
99999 Gainesville-Lake City, FL CSA	30	279	1.89	81.00	95.11	76.67	59.26	2.66	6.67	2.23	16.67
99999 Jacksonville-St. Marys-Palatka, FL-GA CSA	64	738	4.04	117.00	96.56	79.69	49.57	2.16	7.81	1.27	12.50
29460 Lakeland-Winter Haven, FL MSA	62	2,376	3.91	83.00	95.61	61.29	60.24	3.18	24.19	1.20	14.52
99999 North Port-Sarasota, FL CSA (2017-2018)	45	632	2.84	122.00	96.19	77.78	56.56	2.57	13.33	1.24	8.89
99999 North Port-Sarasota, FL CSA (2019)	39	566	2.46	0.00	96.76	84.62	N/A	2.11	12.82	1.13	2.56
36100 Ocala, FL MSA	69	772	4.36	89.00	97.31	81.16	55.06	1.77	11.59	0.92	7.25
37340 Palm Bay-Melbourne-Titusville, FL MSA	37	360	2.34	32.00	97.61	70.27	59.38	1.64	8.11	0.76	21.62
99999 Tallahassee-Bainbridge, FL-GA CSA	8	71	0.51	15.00	96.95	100.00	73.33	1.65	0.00	1.40	0.00
45300 Tampa-St. Petersburg-Clearwater, FL MSA	220	2,383	13.89	226.00	96.31	79.09	54.87	2.30	12.27	1.39	8.64
Total	1,584	19,925	100.00	1,883	96.33	77.15	53.27	2.39	12.63	1.28	10.23

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Georgia																			2017-2019																		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts																				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	11,414	2,991,732	65.48	195,787	3.32	2.89	3.10	17.02	15.84	16.36	34.97	32.13	35.20	44.68	49.11	45.29	0.02	0.04	0.04																		
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	6,018	1,750,150	34.52	N/A	3.32	3.16	N/A	17.02	13.73	N/A	34.97	30.16	N/A	44.68	52.94	N/A	0.02	0.02	N/A																		
Limited Review:																																					
Total	17,432	4,741,882	100.00	195,787	3.32	2.98	3.10	17.02	15.11	16.36	34.97	31.45	35.20	44.68	50.43	45.29	0.02	0.03	0.04																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Georgia																			2017-2019																		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers																				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	11,414	2,991,732	65.48	195,787	22.25	7.39	6.37	16.20	17.88	16.11	17.91	15.45	20.08	43.64	46.91	40.10	0.00	12.37	17.33																		
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	6,018	1,750,150	34.52	N/A	22.25	7.10	N/A	16.20	19.62	N/A	17.91	19.16	N/A	43.64	50.13	N/A	0.00	3.99	N/A																		
Limited Review:																																					
Total	17,432	4,741,882	100.00	195,787	22.25	8.05	6.37	16.20	20.42	16.11	17.91	18.48	20.08	43.64	53.05	40.10	0.00	9.48	17.33																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Georgia																			2017-2019																		
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	27,893	514,573	56.44	148,304	5.87	4.03	4.92	20.20	15.57	18.59	29.67	25.35	28.10	43.63	54.70	48.02	0.63	0.34	0.37																		
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	21,531	367,234	43.56	N/A	5.90	4.30	N/A	20.68	15.47	N/A	29.58	26.98	N/A	43.27	53.04	N/A	0.56	0.21	N/A																		
Limited Review:																																					
Total	49,424	881,807	100.00	148,304	5.89	4.15	4.92	20.48	15.53	18.59	29.62	26.06	28.10	43.43	53.98	48.02	0.59	0.28	0.37																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Georgia											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	27,893	514,573	56.44	148,304	87.54	71.63	46.86	4.75	15.50	7.71	12.87	
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	21,531	367,234	43.56	N/A	89.81	75.19	N/A	3.58	16.40	6.61	8.41	
Limited Review:												
Total	49,424	881,807	100.00	148,304	88.84	73.19	46.86	4.08	15.89	7.08	10.92	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Georgia																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	139	2,671	61.23	300	3.79	0.72	0.33	16.37	12.95	10.33	36.35	39.57	38.67	43.35	46.76	50.33	0.14	0.00	0.33	
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	88	1,056	38.77	N/A	3.81	2.27	N/A	17.18	7.95	N/A	36.05	29.55	N/A	42.79	60.23	N/A	0.17	0.00	N/A	
Limited Review:																				
Total	227	3,727	100.00	300	3.81	1.32	0.33	16.82	11.01	10.33	36.18	35.68	38.67	43.04	51.98	50.33	0.15	0.00	0.33	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Georgia											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2017-2018)	139	2,671	61.23	300.00	95.28	76.98	47.67	2.73	10.07	2.00	12.95	
99999 Atlanta--Athens-Clarke County--Sandy Springs, GA CSA (2019)	88	1,056	38.77	0.00	95.95	87.50	N/A	2.20	4.55	1.85	7.95	
Limited Review:												
Total	227	3,727	100.00	300	95.65	81.06	47.67	2.43	7.93	1.92	11.01	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boise City-Mountain Home-Ontario, ID-OR CSA	2,445	589,376	64.12	35,499	1.53	1.72	1.71	22.16	19.14	20.04	46.43	41.10	47.14	29.89	38.04	31.11	0.00	0.00	0.00	
Limited Review:																				
99999 Idaho Falls-Rexburg-Blackfoot, ID CSA	242	43,692	6.35	5,167	0.00	0.00	0.00	16.32	19.42	16.26	48.67	42.15	48.23	35.01	38.43	35.51	0.00	0.00	0.00	
38540 Pocatello, ID MSA	134	20,751	3.51	3,087	1.76	2.24	4.15	16.07	18.66	12.57	49.37	46.27	45.12	32.80	32.84	38.16	0.00	0.00	0.00	
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID CSA	771	205,256	20.22	9,410	0.00	0.00	0.00	12.77	19.46	15.24	71.96	65.89	72.60	15.27	14.66	12.16	0.00	0.00	0.00	
46300 Twin Falls, ID MSA	109	19,195	2.86	3,165	0.00	0.00	0.00	2.63	3.67	3.03	84.66	82.57	86.64	12.71	13.76	10.33	0.00	0.00	0.00	
99999 ID Non-Metro Roll-up	112	19,962	2.94	1,990	0.00	0.00	0.00	0.00	0.00	0.00	72.24	82.14	79.60	27.76	17.86	20.40	0.00	0.00	0.00	
Total	3,813	898,232	100.00	58,318	0.99	1.18	1.26	17.23	18.20	16.93	54.65	48.75	54.49	27.13	31.86	27.32	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boise City-Mountain Home-Ontario, ID-OR CSA	2,445	589,376	64.12	35,499	18.86	5.69	6.12	18.64	19.30	19.87	21.77	20.74	24.91	40.73	49.98	40.56	0.00	4.29	8.55	
Limited Review:																				
99999 Idaho Falls-Rexburg-Blackfoot, ID CSA	242	43,692	6.35	5,167	18.83	10.33	6.72	18.74	20.25	18.44	20.64	20.66	23.11	41.80	39.67	39.79	0.00	9.09	11.94	
38540 Pocatello, ID MSA	134	20,751	3.51	3,087	21.16	2.24	5.18	19.21	12.69	17.01	19.52	17.91	22.38	40.11	52.99	44.31	0.00	14.18	11.11	
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID CSA	771	205,256	20.22	9,410	18.03	4.93	3.56	20.26	18.16	13.63	22.71	19.71	25.02	39.00	54.09	44.97	0.00	3.11	12.82	
46300 Twin Falls, ID MSA	109	19,195	2.86	3,165	19.19	5.50	4.20	18.55	13.76	18.36	22.38	22.94	24.20	39.88	44.04	41.48	0.00	13.76	11.75	
99999 ID Non-Metro Roll-up	112	19,962	2.94	1,990	17.97	0.00	3.42	15.19	14.29	13.52	20.69	12.50	22.86	46.16	62.50	46.03	0.00	10.71	14.17	
Total	3,813	898,232	100.00	58,318	18.88	5.84	5.51	18.73	19.61	18.28	21.61	21.35	24.52	40.78	53.21	41.64	0.00	5.17	10.04	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Idaho																			2017-2019																		
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate																		
Full Review:																																					
99999 Boise City-Mountain Home- Ontario, ID-OR CSA	6,883	94,887	67.71	13,599	9.81	8.18	10.09	22.98	15.65	21.29	37.36	38.86	37.36	29.85	37.31	31.27	0.00	0.00	0.00																		
Limited Review:																																					
99999 Idaho Falls-Rexburg- Blackfoot, ID CSA	947	11,545	9.32	2,542	0.00	0.00	0.00	26.90	19.43	22.31	34.40	37.80	37.80	38.71	42.77	39.89	0.00	0.00	0.00																		
38540 Pocatello, ID MSA	373	4,332	3.67	1,230	11.64	9.65	4.80	19.98	20.91	23.50	45.55	42.90	43.66	22.83	26.54	28.05	0.00	0.00	0.00																		
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID CSA	1,255	13,999	12.35	3,562	0.00	0.00	0.00	22.26	18.17	18.78	65.01	66.29	68.25	12.73	15.54	12.97	0.00	0.00	0.00																		
46300 Twin Falls, ID MSA	428	5,509	4.21	1,466	0.00	0.00	0.00	10.75	5.61	8.59	75.86	77.80	76.94	13.39	16.59	14.46	0.00	0.00	0.00																		
99999 ID Non-Metro Roll-up	279	3,199	2.74	889	0.00	0.00	0.00	2.48	1.43	0.45	78.85	81.00	77.84	18.67	17.56	21.71	0.00	0.00	0.00																		
Total	10,165	133,471	100.00	23,288	6.96	5.89	6.14	21.53	15.69	19.54	44.69	45.10	46.50	26.82	33.32	27.82	0.00	0.00	0.00																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Idaho												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Boise City-Mountain Home- Ontario, ID-OR CSA	6,883	94,887	67.71	13,599	88.08	71.13	48.03	3.93	14.96	7.99	13.90		
Limited Review:													
99999 Idaho Falls-Rexburg- Blackfoot, ID CSA	947	11,545	9.32	2,542	80.73	71.17	45.44	6.71	17.42	12.56	11.40		
38540 Pocatello, ID MSA	373	4,332	3.67	1,230	79.57	69.44	51.71	5.53	20.38	14.90	10.19		
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID CSA	1,255	13,999	12.35	3,562	86.21	68.13	50.79	5.48	19.04	8.30	12.83		
46300 Twin Falls, ID MSA	428	5,509	4.21	1,466	80.69	68.93	49.45	5.66	15.19	13.65	15.89		
99999 ID Non-Metro Roll-up	279	3,199	2.74	889	80.42	71.68	54.33	4.55	17.56	15.03	10.75		
Total	10,165	133,471	100.00	23,288	86.07	70.62	48.69	4.55	15.98	9.38	13.40		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Idaho																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boise City-Mountain Home-Ontario, ID-OR CSA	168	2,022	59.57	356	4.31	0.00	1.69	22.85	14.88	22.47	46.86	55.95	50.84	25.98	29.17	25.00	0.00	0.00	0.00	
Limited Review:																				
99999 Idaho Falls-Rexburg-Blackfoot, ID CSA	19	215	6.74	130	0.00	0.00	0.00	14.24	5.26	2.31	45.45	78.95	55.38	40.30	15.79	42.31	0.00	0.00	0.00	
38540 Pocatello, ID MSA	8	77	2.84	45	2.72	0.00	2.22	13.59	0.00	2.22	55.43	87.50	73.33	28.26	12.50	22.22	0.00	0.00	0.00	
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID CSA	18	203	6.38	39	0.00	0.00	0.00	14.52	16.67	5.13	72.05	72.22	87.18	13.42	11.11	7.69	0.00	0.00	0.00	
46300 Twin Falls, ID MSA	48	480	17.02	204	0.00	0.00	0.00	2.01	0.00	0.49	85.74	77.08	90.69	12.25	22.92	8.82	0.00	0.00	0.00	
99999 ID Non-Metro Roll-up	21	194	7.45	141	0.00	0.00	0.00	0.28	0.00	0.00	62.32	90.48	48.23	37.39	9.52	51.77	0.00	0.00	0.00	
Total	282	3,191	100.00	915	2.53	0.00	0.77	16.22	10.28	9.51	55.85	65.60	62.62	25.40	24.11	27.10	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Idaho												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Boise City-Mountain Home-Ontario, ID-OR CSA	168	2,022	59.57	356.00	95.46	77.38	59.83	3.40	11.31	1.15	11.31		
Limited Review:													
99999 Idaho Falls-Rexburg-Blackfoot, ID CSA	19	215	6.74	130.00	93.64	52.63	73.08	3.64	31.58	2.73	15.79		
38540 Pocatello, ID MSA	8	77	2.84	45.00	97.28	100.00	55.56	1.09	0.00	1.63	0.00		
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID CSA	18	203	6.38	39.00	96.71	83.33	61.54	2.19	16.67	1.10	0.00		
46300 Twin Falls, ID MSA	48	480	17.02	204.00	92.97	66.67	54.90	4.82	18.75	2.21	14.58		
99999 ID Non-Metro Roll-up	21	194	7.45	141.00	95.47	80.95	65.25	3.12	9.52	1.42	9.52		
Total	282	3,191	100.00	915	95.19	75.18	61.31	3.35	13.83	1.46	10.99		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
16580 Champaign-Urbana, IL MSA	396	63,607	15.66	5,119	4.85	4.04	4.96	10.78	12.37	11.99	58.11	55.56	55.71	26.14	28.03	27.08	0.11	0.00	0.25	
Limited Review:																				
99999 Bloomington-Pontiac, IL CSA	336	55,874	13.29	4,770	2.27	1.49	3.14	14.29	10.71	11.34	53.92	42.86	52.83	29.52	44.94	32.68	0.00	0.00	0.00	
99999 Davenport-Moline, IA-IL (part) CSA	170	18,363	6.72	5,760	0.82	0.59	0.69	23.32	17.06	20.63	65.77	70.59	67.43	10.09	11.76	11.25	0.00	0.00	0.00	
99999 Peoria-Canton, IL CSA	452	64,501	17.88	9,528	3.55	1.77	1.86	12.63	9.96	16.05	53.08	52.65	49.66	30.74	35.62	32.43	0.00	0.00	0.00	
99999 Rockford-Freepport-Rochelle, IL CSA	965	120,245	38.17	9,269	5.11	2.59	2.76	15.89	8.60	13.58	33.53	30.26	36.10	45.43	58.45	47.49	0.04	0.10	0.06	
99999 Springfield-Jacksonville-Lincoln, IL CSA	209	26,127	8.27	5,626	9.24	8.13	6.11	12.43	11.96	12.78	45.95	46.41	47.32	32.39	33.49	33.79	0.00	0.00	0.00	
Total	2,528	348,717	99.99	40,072	4.39	2.85	3.05	14.77	10.56	14.60	50.19	43.95	49.90	30.63	42.60	32.41	0.02	0.04	0.05	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
16580 Champaign-Urbana, IL MSA	396	63,607	15.66	5,119	21.79	6.57	10.29	16.51	17.68	19.16	20.68	22.73	21.14	41.02	35.61	32.33	0.00	17.42	17.07	
Limited Review:																				
99999 Bloomington-Pontiac, IL CSA	336	55,874	13.29	4,770	19.36	9.23	13.86	17.30	16.67	21.11	22.24	24.40	20.13	41.10	40.18	26.02	0.00	9.52	18.89	
99999 Davenport-Moline, IA-IL (part) CSA	170	18,363	6.72	5,760	21.36	8.82	14.08	19.36	19.41	21.89	22.18	24.71	22.07	37.10	24.12	25.10	0.00	22.94	16.86	
99999 Peoria-Canton, IL CSA	452	64,501	17.88	9,528	20.58	7.30	13.69	17.96	12.17	20.32	21.35	17.92	19.71	40.11	33.85	28.30	0.00	28.76	17.99	
99999 Rockford-Freepport-Rochelle, IL CSA	965	120,245	38.17	9,269	21.89	6.32	9.94	17.03	16.37	19.51	20.36	23.11	21.81	40.73	41.14	26.68	0.00	13.06	22.06	
99999 Springfield-Jacksonville-Lincoln, IL CSA	209	26,127	8.27	5,626	22.49	11.48	12.02	16.23	22.49	20.16	20.71	14.83	21.53	40.57	31.10	30.47	0.00	20.10	15.84	
Total	2,528	348,717	99.99	40,072	21.28	9.09	12.23	17.43	20.05	20.28	21.15	26.27	21.02	40.13	44.59	28.01	0.00	17.33	18.46	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Illinois																		2017-2019		
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	
Full Review:																				
16580 Champaign-Urbana, IL MSA	1,590	20,521	18.48	2,680	10.08	9.25	9.70	17.32	11.70	14.63	41.92	47.48	44.70	28.10	29.75	29.66	2.57	1.82	1.31	
Limited Review:																				
99999 Bloomington-Pontiac, IL CSA	1,004	15,633	11.67	2,443	8.88	6.67	6.51	10.09	11.55	13.10	59.68	47.21	48.26	21.34	34.56	32.13	0.00	0.00	0.00	
99999 Davenport-Moline, IA-IL (part) CSA	760	14,404	8.83	2,240	4.41	4.47	4.64	34.10	26.97	35.13	54.44	55.66	52.14	7.05	12.89	8.08	0.00	0.00	0.00	
99999 Peoria-Canton, IL CSA	1,727	35,004	20.07	5,208	11.08	8.40	9.31	14.97	9.73	10.77	46.63	43.60	47.54	27.31	38.27	32.37	0.00	0.00	0.00	
99999 Rockford-Freepport- Rochelle, IL CSA	2,277	44,420	26.47	4,292	8.82	8.12	8.48	15.40	13.22	16.10	28.58	30.61	29.22	44.98	45.54	43.73	2.22	2.50	2.47	
99999 Springfield-Jacksonville- Lincoln, IL CSA	1,245	27,315	14.47	2,538	15.26	9.16	13.95	17.20	12.29	16.15	40.92	39.84	37.31	26.63	38.71	32.58	0.00	0.00	0.00	
Total	8,603	157,297	99.99	19,401	10.03	8.04	8.90	17.58	13.12	16.29	43.07	41.82	42.38	28.41	36.01	31.70	0.92	1.00	0.73	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Illinois												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
16580 Champaign-Urbana, IL MSA	1,590	20,521	18.48	2,680	78.46	71.19	44.25	5.26	15.60	16.28	13.21		
Limited Review:													
99999 Bloomington-Pontiac, IL CSA	1,004	15,633	11.67	2,443	76.60	68.82	42.16	6.58	17.33	16.82	13.84		
99999 Davenport-Moline, IA-IL (part) CSA	760	14,404	8.83	2,240	74.91	67.24	52.14	7.56	21.18	17.53	11.58		
99999 Peoria-Canton, IL CSA	1,727	35,004	20.07	5,208	75.09	59.29	44.05	7.68	27.16	17.24	13.55		
99999 Rockford-Freepport- Rochelle, IL CSA	2,277	44,420	26.47	4,292	80.00	62.14	43.55	7.21	22.75	12.78	15.11		
99999 Springfield-Jacksonville- Lincoln, IL CSA	1,245	27,315	14.47	2,538	75.21	62.01	44.48	7.13	22.01	17.66	15.98		
Total	8,603	157,297	99.99	19,401	76.91	64.45	44.72	6.98	21.43	16.11	14.11		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Illinois																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
16580 Champaign-Urbana, IL MSA	49	456	14.37	235	2.77	0.00	0.00	5.26	0.00	0.85	71.19	81.63	79.15	20.78	18.37	20.00	0.00	0.00	0.00	
Limited Review:																				
99999 Bloomington-Pontiac, IL CSA	39	305	11.44	411	1.10	2.56	0.24	4.59	0.00	1.95	73.03	71.79	81.27	21.28	25.64	16.55	0.00	0.00	0.00	
99999 Davenport-Moline, IA-IL (part) CSA	50	407	14.66	206	0.00	0.00	0.00	9.75	2.00	5.83	80.24	82.00	79.61	10.01	16.00	14.56	0.00	0.00	0.00	
99999 Peoria-Canton, IL CSA	113	1,141	33.14	921	1.48	0.00	0.22	6.98	1.77	0.43	61.90	60.18	80.02	29.64	38.05	19.33	0.00	0.00	0.00	
99999 Rockford-Freeport-Rochelle, IL CSA	40	306	11.73	131	3.22	0.00	0.00	10.91	0.00	0.76	33.01	35.00	29.01	52.31	65.00	70.23	0.56	0.00	0.00	
99999 Springfield-Jacksonville-Lincoln, IL CSA	50	1,632	14.66	163	5.46	6.00	1.23	6.55	0.00	0.61	60.37	66.00	74.85	27.61	28.00	23.31	0.00	0.00	0.00	
Total	341	4,247	100.00	2,067	2.22	1.17	0.24	7.43	0.88	1.35	62.96	65.69	76.49	27.30	32.26	21.92	0.09	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Illinois												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
16580 Champaign-Urbana, IL MSA	49	456	14.37	235.00	96.12	65.31	52.34	1.39	2.04	2.49	32.65		
Limited Review:													
99999 Bloomington-Pontiac, IL CSA	39	305	11.44	411.00	96.70	87.18	68.61	1.47	5.13	1.83	7.69		
99999 Davenport-Moline, IA-IL (part) CSA	50	407	14.66	206.00	97.86	72.00	55.83	0.93	6.00	1.20	22.00		
99999 Peoria-Canton, IL CSA	113	1,141	33.14	921.00	96.88	65.49	75.03	1.40	11.50	1.72	23.01		
99999 Rockford-Freeport-Rochelle, IL CSA	40	306	11.73	131.00	95.52	70.00	51.91	2.94	7.50	1.54	22.50		
99999 Springfield-Jacksonville-Lincoln, IL CSA	50	1,632	14.66	163.00	96.57	86.00	50.31	1.09	8.00	2.34	6.00		
Total	341	4,247	100.00	2,067	96.64	72.43	65.84	1.53	7.62	1.83	19.94		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Indiana																		2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	7,211	1,215,027	44.34	76,071	6.11	3.30	4.14	16.43	14.46	14.11	35.00	30.47	33.80	42.35	51.71	47.86	0.11	0.06	0.09	
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	4,008	774,275	24.65	N/A	6.11	3.04	N/A	16.43	10.70	N/A	35.00	29.62	N/A	42.35	56.61	N/A	0.11	0.02	N/A	
Limited Review:																				
99999 Bloomington-Bedford, IN CSA (2017-2018)	451	71,937	2.77	5,038	2.11	1.55	1.81	8.54	9.76	11.12	59.56	48.56	54.62	29.78	40.13	32.41	0.01	0.00	0.04	
99999 Bloomington-Bedford, IN CSA (2019)	217	36,406	1.33	N/A	2.11	2.30	N/A	8.54	11.06	N/A	59.56	46.54	N/A	29.78	40.09	N/A	0.01	0.00	N/A	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	1,444	193,532	8.88	15,887	5.37	1.04	1.76	13.15	12.67	11.81	49.91	42.94	47.76	31.48	43.35	38.62	0.09	0.00	0.04	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	737	110,489	4.53	N/A	5.37	1.22	N/A	13.15	9.91	N/A	49.91	40.71	N/A	31.48	48.17	N/A	0.09	0.00	N/A	
99999 Lafayette-West Lafayette-Frankfort, IN CSA	595	83,242	3.66	5,715	1.15	1.18	1.35	16.19	13.78	16.48	35.25	33.11	33.44	47.29	51.93	48.42	0.12	0.00	0.31	
99999 Richmond-Connersville, IN CSA	117	10,519	0.72	1,313	2.11	1.71	1.29	30.92	29.91	28.56	59.85	58.97	64.36	7.12	9.40	5.79	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	919	125,444	5.65	14,048	3.03	0.87	1.95	13.90	10.45	10.24	52.36	58.98	56.26	30.71	29.71	31.56	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	518	561,388	3.19	N/A	3.03	2.12	N/A	13.90	11.20	N/A	52.36	52.51	N/A	30.71	34.17	N/A	0.00	0.00	N/A	
99999 IN Non-Metro Roll-up	45	5,031	0.28	671	0.00	0.00	0.00	15.73	17.78	34.72	84.27	82.22	65.28	0.00	0.00	0.00	0.00	0.00	0.00	
Total	16,262	3,187,290	100.00	118,743	5.13	2.61	3.28	15.27	12.76	13.61	41.77	35.30	39.71	37.75	49.30	43.33	0.08	0.03	0.08	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Indiana 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	7,211	1,215,027	44.34	76,071	21.53	9.55	9.83	16.90	21.72	20.24	19.43	20.47	20.53	42.14	38.41	34.37	0.00	9.85	15.03	
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	4,008	774,275	24.65	N/A	21.53	9.28	N/A	16.90	21.61	N/A	19.43	21.51	N/A	42.14	43.04	N/A	0.00	4.57	N/A	
Limited Review:																				
99999 Bloomington-Bedford, IN CSA (2017-2018)	451	71,937	2.77	5,038	21.25	6.65	9.17	16.85	20.40	20.68	20.55	21.73	21.54	41.36	43.46	33.17	0.00	7.76	15.44	
99999 Bloomington-Bedford, IN CSA (2019)	217	36,406	1.33	N/A	21.25	7.37	N/A	16.85	18.89	N/A	20.55	27.19	N/A	41.36	41.47	N/A	0.00	5.07	N/A	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	1,444	193,532	8.88	15,887	19.81	11.50	10.18	18.05	29.36	22.28	21.99	19.39	21.26	40.16	28.39	30.92	0.00	11.36	15.36	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	737	110,489	4.53	N/A	19.81	11.40	N/A	18.05	23.34	N/A	21.99	22.93	N/A	40.16	37.31	N/A	0.00	5.02	N/A	
99999 Lafayette-West Lafayette-Frankfort, IN CSA	595	83,242	3.66	5,715	20.52	8.74	9.66	15.69	25.71	21.73	22.97	24.03	21.05	40.82	31.26	32.20	0.00	10.25	15.36	
99999 Richmond-Connersville, IN CSA	117	10,519	0.72	1,313	25.44	11.11	14.24	19.82	23.08	25.74	19.61	24.79	22.09	35.13	17.95	23.23	0.00	23.08	14.70	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	919	125,444	5.65	14,048	20.72	8.27	8.35	17.32	23.50	20.86	21.53	23.29	23.43	40.43	32.75	33.30	0.00	12.19	14.07	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	518	561,388	3.19	N/A	20.72	15.06	N/A	17.32	23.36	N/A	21.53	23.17	N/A	40.43	34.94	N/A	0.00	3.47	N/A	
99999 IN Non-Metro Roll-up	45	5,031	0.28	671	26.60	8.89	19.08	24.61	24.44	24.29	24.27	13.33	19.67	24.52	11.11	18.48	0.00	42.22	18.48	
Total	16,262	3,187,290	100.00	118,743	21.18	10.61	9.77	17.17	24.78	20.76	20.29	23.22	21.05	41.36	41.38	33.41	0.00	8.47	15.01	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Indiana																			2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate		
Full Review:																					
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	13,086	280,015	39.56	33,656	8.15	5.53	7.47	18.97	12.68	16.89	32.27	28.16	30.78	40.29	53.47	44.60	0.32	0.16	0.27		
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	9,799	170,965	29.63	N/A	9.11	5.30	N/A	19.37	13.47	N/A	31.02	28.96	N/A	40.18	52.08	N/A	0.31	0.19	N/A		
Limited Review:																					
99999 Bloomington-Bedford, IN CSA (2017-2018)	976	20,212	2.95	2,416	4.53	3.07	4.43	21.50	20.18	22.35	45.16	37.09	42.22	27.27	39.14	30.67	1.54	0.51	0.33		
99999 Bloomington-Bedford, IN CSA (2019)	692	9,977	2.09	N/A	4.55	1.88	N/A	21.73	22.98	N/A	43.88	41.62	N/A	28.39	33.38	N/A	1.45	0.14	N/A		
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	2,082	53,470	6.29	7,232	6.17	4.08	5.99	18.09	16.09	18.03	42.63	39.39	41.58	28.71	37.27	30.48	4.41	3.17	3.93		
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	1,745	36,911	5.28	N/A	6.36	4.76	N/A	17.66	13.87	N/A	41.70	42.35	N/A	30.13	35.93	N/A	4.14	3.09	N/A		
99999 Lafayette-West Lafayette-Frankfort, IN CSA	1,227	20,267	3.71	1,995	4.65	4.16	5.01	30.21	22.98	32.83	26.32	27.55	26.27	34.64	42.79	33.83	4.17	2.53	2.06		
99999 Richmond-Connersville, IN CSA	285	3,855	0.86	817	12.18	12.28	9.55	28.86	23.86	26.81	53.85	60.00	59.00	5.11	3.86	4.65	0.00	0.00	0.00		
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	1,722	45,450	5.21	6,446	7.42	4.01	6.33	16.01	12.83	14.49	51.71	55.28	53.99	24.86	27.87	25.19	0.00	0.00	0.00		
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	1,347	31,213	4.07	N/A	7.30	4.53	N/A	16.23	14.55	N/A	51.65	50.56	N/A	24.83	30.36	N/A	0.00	0.00	N/A		
99999 IN Non-Metro Roll-up	114	1,114	0.34	209	0.00	0.00	0.00	10.95	25.44	9.09	89.05	74.56	90.91	0.00	0.00	0.00	0.00	0.00	0.00		
Total	33,075	673,449	99.99	52,771	7.89	5.05	6.90	19.04	14.23	17.73	36.54	33.13	36.12	35.59	46.99	38.45	0.94	0.60	0.80		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Indiana											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	13,086	280,015	39.56	33,656	81.82	68.16	41.88	6.41	18.26	11.77	13.58	
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	9,799	170,965	29.63	N/A	84.87	70.30	N/A	5.21	19.55	9.92	10.14	
Limited Review:												
99999 Bloomington-Bedford, IN CSA (2017-2018)	976	20,212	2.95	2,416	81.92	67.01	35.68	5.45	18.14	12.63	14.86	
99999 Bloomington-Bedford, IN CSA (2019)	692	9,977	2.09	N/A	83.74	71.68	N/A	4.86	20.66	11.41	7.66	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	2,082	53,470	6.29	7,232	79.58	67.00	43.42	7.29	22.00	13.12	11.00	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	1,745	36,911	5.28	N/A	81.88	66.48	N/A	6.22	24.36	11.90	9.17	
99999 Lafayette-West Lafayette-Frankfort, IN CSA	1,227	20,267	3.71	1,995	82.34	69.68	43.66	4.78	18.34	12.88	11.98	
99999 Richmond-Connersville, IN CSA	285	3,855	0.86	817	77.79	70.88	52.02	6.96	18.95	15.25	10.18	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	1,722	45,450	5.21	6,446	78.37	63.47	39.09	8.05	26.07	13.58	10.45	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	1,347	31,213	4.07	N/A	80.74	62.73	N/A	6.96	28.36	12.31	8.91	
99999 IN Non-Metro Roll-up	114	1,114	0.34	209	81.32	58.77	35.41	3.91	31.58	14.77	9.65	
Total	33,075	673,449	99.99	52,771	82.52	68.26	41.67	6.06	20.12	11.42	11.63	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Indiana																		2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate
Full Review :																			
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	185	10,845	30.88	648	3.66	3.24	0.62	10.52	0.00	1.85	47.36	59.46	64.97	38.34	37.30	32.25	0.12	0.00	0.31
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	165	4,641	27.55	N/A	4.45	4.24	N/A	11.28	2.42	N/A	45.08	60.00	N/A	39.08	33.33	N/A	0.11	0.00	N/A
Limited Review :																			
99999 Bloomington-Bedford, IN CSA (2017-2018)	34	433	5.68	64	1.05	2.94	1.56	6.30	0.00	0.00	69.82	85.29	76.56	22.83	11.76	21.88	0.00	0.00	0.00
99999 Bloomington-Bedford, IN CSA (2019)	12	124	2.00	N/A	1.45	0.00	N/A	6.30	0.00	N/A	66.59	58.33	N/A	25.67	41.67	N/A	0.00	0.00	N/A
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	32	673	5.34	337	1.89	0.00	0.30	6.67	3.13	0.59	60.96	71.88	75.96	29.98	25.00	22.85	0.49	0.00	0.30
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	24	310	4.01	N/A	2.10	0.00	N/A	7.40	0.00	N/A	60.87	70.83	N/A	28.92	29.17	N/A	0.70	0.00	N/A
99999 Lafayette-West Lafayette-Frankfort, IN CSA	65	3,803	10.85	89	1.26	0.00	0.00	10.74	4.62	4.49	37.26	60.00	51.69	50.74	35.38	43.82	0.00	0.00	0.00
99999 Richmond-Connersville, IN CSA	23	294	3.84	192	0.35	0.00	0.52	8.39	0.00	0.52	71.33	82.61	87.50	19.93	17.39	11.46	0.00	0.00	0.00
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2017-2018)	26	462	4.34	199	1.38	0.00	0.00	6.03	3.85	2.01	53.31	69.23	47.24	39.27	26.92	50.75	0.00	0.00	0.00
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2019)	32	570	5.34	N/A	1.83	0.00	N/A	7.14	12.50	N/A	54.58	53.13	N/A	36.45	34.38	N/A	0.00	0.00	N/A
99999 IN Non-Metro Roll-up	1	12	0.17	11	0.00	0.00	0.00	10.29	0.00	0.00	89.71	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	599	22,167	100.00	1,540	3.08	2.34	0.45	9.39	2.17	1.49	51.21	63.27	67.86	36.16	32.22	30.00	0.17	0.00	0.19

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Indiana											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Indianapolis-Carmel-Muncie, IN CSA (2017-2018)	185	10,845	30.88	648.00	95.67	81.62	48.92	2.48	10.27	1.86	8.11	
99999 Indianapolis-Carmel-Muncie, IN CSA (2019)	165	4,641	27.55	0.00	95.93	71.52	N/A	2.35	18.79	1.72	9.70	
Limited Review:												
99999 Bloomington-Bedford, IN CSA (2017-2018)	34	433	5.68	64.00	98.16	88.24	48.44	1.31	0.00	0.52	11.76	
99999 Bloomington-Bedford, IN CSA (2019)	12	124	2.00	0.00	97.82	58.33	N/A	1.69	16.67	0.48	25.00	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2017-2018)	32	673	5.34	337.00	96.71	62.50	63.20	1.98	9.38	1.32	28.13	
99999 Fort Wayne-Huntington-Auburn, IN CSA (2019)	24	310	4.01	0.00	96.80	50.00	N/A	1.87	12.50	1.33	37.50	
99999 Lafayette-West Lafayette-Frankfort, IN CSA	65	3,803	10.85	89.00	96.21	72.31	37.08	1.68	23.08	2.11	4.62	
99999 Richmond-Connersville, IN CSA	23	294	3.84	192.00	98.60	78.26	85.94	0.70	13.04	0.70	8.70	
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2017-2018)	26	462	4.34	199.00	96.74	76.92	57.79	2.47	19.23	0.79	3.85	
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2019)	32	570	5.34	0.00	96.82	68.75	N/A	2.31	25.00	0.87	6.25	
99999 IN Non-Metro Roll-up	1	12	0.17	11.00	100.00	100.00	45.45	0.00	0.00	0.00	0.00	
Total	599	22,167	100.00	1,540	96.30	74.46	57.08	2.21	14.86	1.49	10.68	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	1,361	271,169	53.73	14,662	4.34	3.16	3.48	17.45	16.97	17.61	36.60	31.23	34.14	41.62	48.64	44.77	0.00	0.00	0.00	
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	763	145,070	30.12	N/A	4.34	4.33	N/A	17.45	17.96	N/A	36.60	31.45	N/A	41.62	46.26	N/A	0.00	0.00	N/A	
Limited Review:																				
99999 Bowling Green-Glasgow, KY CSA	147	27,849	5.80	3,982	2.80	0.68	3.54	11.37	10.20	11.07	34.13	28.57	31.04	51.31	60.54	53.52	0.40	0.00	0.83	
36980 Owensboro, KY MSA	164	20,339	6.47	2,844	1.83	0.61	1.16	18.05	17.68	17.79	50.94	46.34	51.16	29.18	35.37	29.89	0.00	0.00	0.00	
99999 KY Non-Metro Roll-up	98	12,509	3.87	680	0.00	0.00	0.00	0.00	0.00	0.00	56.01	52.04	56.76	43.99	47.96	43.24	0.00	0.00	0.00	
Total	2,533	476,936	99.99	22,168	3.80	3.08	3.09	16.40	16.27	15.92	38.37	32.93	36.46	41.38	47.73	44.38	0.04	0.00	0.15	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	1,361	271,169	53.73	14,662	23.09	9.70	8.61	15.24	18.88	15.13	18.26	21.31	18.76	43.42	41.07	38.66	0.00	9.04	18.84	
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	763	145,070	30.12	N/A	23.09	12.45	N/A	15.24	21.76	N/A	18.26	22.67	N/A	43.42	40.10	N/A	0.00	3.01	N/A	
Limited Review:																				
99999 Bowling Green-Glasgow, KY CSA	147	27,849	5.80	3,982	19.72	4.76	6.25	16.64	14.29	14.69	19.66	19.73	18.56	43.98	49.66	40.81	0.00	11.56	19.69	
36980 Owensboro, KY MSA	164	20,339	6.47	2,844	21.81	12.80	8.09	17.66	22.56	20.01	19.69	19.51	23.31	40.84	35.37	31.19	0.00	9.76	17.41	
99999 KY Non-Metro Roll-up	98	12,509	3.87	680	19.09	4.08	4.71	15.08	5.10	11.18	17.31	21.43	20.59	48.52	51.02	45.44	0.00	18.37	18.09	
Total	2,533	476,936	99.99	22,168	22.50	11.09	8.00	15.61	20.80	15.56	18.52	23.33	19.36	43.36	44.78	38.30	0.00	7.78	18.78	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Kentucky																			2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate		
Full Review:																					
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	2,486	60,087	41.97	9,306	5.80	4.30	5.33	18.06	16.37	19.59	40.67	34.71	38.86	35.46	44.61	36.22	0.00	0.00	0.00		
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	1,850	37,354	31.23	N/A	5.81	5.30	N/A	17.84	17.14	N/A	40.35	35.73	N/A	35.99	41.84	N/A	0.00	0.00	N/A		
Limited Review:																					
99999 Bowling Green-Glasgow, KY CSA	843	14,405	14.23	2,393	7.40	3.56	5.98	20.10	15.54	19.47	31.75	34.05	28.33	35.03	41.99	43.13	5.71	4.86	3.09		
36980 Owensboro, KY MSA	566	8,594	9.56	1,757	3.01	2.30	2.56	30.58	24.20	28.57	40.57	35.16	39.90	25.83	38.34	28.97	0.00	0.00	0.00		
99999 KY Non-Metro Roll-up	178	2,582	3.01	385	0.00	0.00	0.00	0.00	0.00	0.00	60.75	48.31	55.32	39.25	51.69	44.68	0.00	0.00	0.00		
Total	5,923	123,022	100.00	13,841	5.62	4.19	4.94	18.69	16.75	20.16	40.15	35.39	37.63	35.01	42.98	36.73	0.53	0.69	0.53		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Kentucky												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	2,486	60,087	41.97	9,306	82.49	69.63	42.95	5.78	19.63	11.72	10.74		
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	1,850	37,354	31.23	N/A	83.98	69.78	N/A	5.08	21.95	10.93	8.27		
Limited Review:													
99999 Bowling Green-Glasgow, KY CSA	843	14,405	14.23	2,393	80.72	66.79	48.52	6.01	24.67	13.27	8.54		
36980 Owensboro, KY MSA	566	8,594	9.56	1,757	80.80	71.55	50.09	5.91	16.96	13.29	11.48		
99999 KY Non-Metro Roll-up	178	2,582	3.01	385	79.25	70.22	41.82	5.12	20.79	15.63	8.99		
Total	5,923	123,022	100.00	13,841	82.77	69.47	44.79	5.50	20.85	11.73	9.67		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Kentucky																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	110	8,103	53.92	193	4.05	5.45	2.59	13.20	2.73	7.77	39.35	50.91	46.11	43.40	40.91	43.52	0.00	0.00	0.00	
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	61	3,411	29.90	N/A	4.55	9.84	N/A	13.58	3.28	N/A	39.63	59.02	N/A	42.24	27.87	N/A	0.00	0.00	N/A	
Limited Review:																				
99999 Bowling Green-Glasgow, KY CSA	6	34	2.94	83	1.54	0.00	1.20	5.13	0.00	3.61	34.36	0.00	31.33	57.69	100.00	63.86	1.28	0.00	0.00	
36980 Owensboro, KY MSA	24	1,470	11.76	216	0.00	0.00	0.00	10.71	0.00	4.17	50.00	58.33	53.70	39.29	41.67	42.13	0.00	0.00	0.00	
99999 KY Non-Metro Roll-up	3	28	1.47	15	0.00	0.00	0.00	0.00	0.00	0.00	35.65	33.33	6.67	64.35	66.67	93.33	0.00	0.00	0.00	
Total	204	13,046	99.99	507	3.43	5.88	1.18	11.74	2.45	5.33	39.81	52.45	45.76	44.88	39.22	47.73	0.15	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Kentucky												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2017-2018)	110	8,103	53.92	193.00	95.47	75.45	47.15	2.83	15.45	1.70	9.09		
99999 Lexington-Fayette-- Richmond--Frankfort, KY CSA (2019)	61	3,411	29.90	0.00	95.60	67.21	N/A	2.69	26.23	1.72	6.56		
Limited Review:													
99999 Bowling Green-Glasgow, KY CSA	6	34	2.94	83.00	98.46	33.33	40.96	0.77	0.00	0.77	66.67		
36980 Owensboro, KY MSA	24	1,470	11.76	216.00	98.21	87.50	63.43	1.49	12.50	0.30	0.00		
99999 KY Non-Metro Roll-up	3	28	1.47	15.00	98.26	33.33	20.00	1.74	66.67	0.00	0.00		
Total	204	13,046	99.99	507	96.22	72.55	52.27	2.37	18.63	1.41	8.82		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Louisiana																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
12940 Baton Rouge, LA MSA 99999	2,684	572,180	23.36	21,389	4.01	1.08	1.80	18.60	12.93	14.37	37.68	27.01	36.81	39.71	58.98	47.01	0.00	0.00	0.00	
Monroe-Ruston, LA CSA (2017-2018) 99999	276	41,287	2.40	4,623	8.47	2.17	3.98	11.45	5.43	7.33	21.94	28.99	27.71	58.13	63.04	60.93	0.00	0.36	0.04	
Monroe-Ruston, LA CSA (2019) 99999	107	15,848	0.93	N/A	8.47	0.93	N/A	11.45	8.41	N/A	21.94	21.50	N/A	58.13	69.16	N/A	0.00	0.00	N/A	
Limited Review:																				
10780 Alexandria, LA MSA 99999	171	22,100	1.49	2,833	4.49	1.17	2.08	8.49	4.09	6.57	45.02	46.78	42.78	41.99	47.95	48.57	0.01	0.00	0.00	
DeRidder-Fort Polk South, LA CSA 26380 Houma-Thibodaux, LA MSA 99999	72	9,727	0.63	933	0.00	0.00	0.00	0.00	0.00	0.00	35.86	22.22	35.16	64.14	77.78	64.84	0.00	0.00	0.00	
Lafayette-Opelousas- Morgan City, LA CSA (2017-2018) 99999	898	130,253	7.82	4,223	0.00	0.00	0.00	13.97	9.91	13.00	64.48	56.24	61.00	21.55	33.85	26.00	0.00	0.00	0.00	
Lafayette-Opelousas- Morgan City, LA CSA (2019) 99999	861	137,218	7.49	11,746	3.55	1.97	2.83	21.03	11.50	13.55	48.01	43.44	43.60	27.41	43.09	40.03	0.00	0.00	0.00	
Lafayette-Opelousas- Morgan City, LA CSA (2019) 99999	417	73,416	3.63	N/A	3.55	1.44	N/A	21.03	12.95	N/A	48.01	36.45	N/A	27.41	49.16	N/A	0.00	0.00	N/A	
Lake Charles-Jennings, LA CSA 99999	618	100,815	5.38	5,462	2.88	2.10	2.44	18.74	12.46	17.12	41.50	33.82	39.29	36.88	51.62	41.14	0.00	0.00	0.02	
New Orleans-Metairie- Hammond, LA-MS (part) CSA (2017-2018) 99999	3,027	602,269	26.35	34,717	5.06	4.10	5.28	19.57	14.57	16.36	39.44	35.22	37.46	35.49	45.42	40.16	0.44	0.69	0.73	
New Orleans-Metairie- Hammond, LA-MS (part) CSA (2019) 43340	1,812	423,786	15.77	N/A	5.06	5.41	N/A	19.57	14.35	N/A	39.44	33.00	N/A	35.49	46.41	N/A	0.44	0.83	N/A	
Shreveport-Bossier City, LA MSA	546	82,466	4.75	9,538	7.23	2.20	2.33	15.94	9.16	9.65	36.00	31.68	30.77	40.84	56.96	57.26	0.00	0.00	0.00	
Total	11,489	2,211,365	100.00	95,464	4.65	2.68	3.30	18.38	12.60	13.91	40.78	34.82	38.21	36.00	49.57	44.31	0.19	0.32	0.27	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data. 'N/A' 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 - Louisiana																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
12940 Baton Rouge, LA MSA	2,684	572,180	23.36	21,389	23.67	4.92	6.52	16.08	15.69	18.01	17.96	15.31	19.90	42.29	47.06	34.47	0.00	17.03	21.10	
99999 Monroe-Ruston, LA CSA (2017-2018)	276	41,287	2.40	4,623	25.00	3.99	2.99	15.66	6.52	8.48	15.25	14.13	16.79	44.09	35.14	48.93	0.00	40.22	22.82	
99999 Monroe-Ruston, LA CSA (2019)	107	15,848	0.93	N/A	25.00	0.93	N/A	15.66	7.48	N/A	15.25	16.82	N/A	44.09	49.53	N/A	0.00	25.23	N/A	
Limited Review:																				
10780 Alexandria, LA MSA	171	22,100	1.49	2,833	23.76	4.09	4.13	16.40	10.53	13.45	17.90	14.62	17.90	41.94	35.67	42.29	0.00	35.09	22.24	
99999 DeRidder-Fort Polk South, LA CSA	72	9,727	0.63	933	17.63	4.17	2.79	13.95	6.94	9.75	15.89	18.06	15.86	52.54	52.78	53.48	0.00	18.06	18.11	
26380 Houma-Thibodaux, LA MSA	898	130,253	7.82	4,223	22.66	6.12	6.01	16.22	13.25	15.58	18.74	22.38	19.70	42.38	46.33	36.94	0.00	11.92	21.76	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2017-2018)	861	137,218	7.49	11,746	25.35	4.99	6.33	15.98	12.66	16.29	16.73	14.87	19.81	41.95	39.14	36.79	0.00	28.34	20.78	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2019)	417	73,416	3.63	N/A	25.35	3.12	N/A	15.98	14.15	N/A	16.73	20.14	N/A	41.95	49.16	N/A	0.00	13.43	N/A	
99999 Lake Charles-Jennings, LA CSA	618	100,815	5.38	5,462	23.69	3.40	3.28	16.81	11.00	10.47	17.93	16.67	19.04	41.57	53.40	45.17	0.00	15.53	22.04	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2017-2018)	3,027	602,269	26.35	34,717	25.09	5.58	5.05	15.75	14.40	15.06	17.27	16.85	18.50	41.88	48.20	41.56	0.00	14.97	19.82	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2019)	1,812	423,786	15.77	N/A	25.09	5.52	N/A	15.75	17.60	N/A	17.27	18.21	N/A	41.88	53.48	N/A	0.00	5.19	N/A	
43340 Shreveport-Bossier City, LA MSA	546	82,466	4.75	9,538	24.39	6.23	4.91	15.28	12.27	14.12	16.78	16.48	19.84	43.54	38.28	37.89	0.00	26.74	23.24	
Total	11,489	2,211,365	100.00	95,464	24.68	6.12	5.32	15.86	17.11	15.12	17.17	20.28	19.06	42.29	56.49	39.52	0.00	16.22	20.98	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Louisiana																		2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
12940 Baton Rouge, LA MSA	7,101	198,998	18.00	15,963	6.49	2.92	4.95	21.29	14.65	18.92	30.76	28.31	30.87	41.40	54.13	45.21	0.05	0.00	0.06	
99999 Monroe-Ruston, LA CSA (2017-2018)	660	19,216	1.67	4,863	16.43	8.79	15.83	12.88	10.00	11.72	25.08	22.12	17.85	45.44	58.94	54.39	0.17	0.15	0.21	
99999 Monroe-Ruston, LA CSA (2019)	614	9,456	1.56	N/A	15.83	9.93	N/A	12.59	7.65	N/A	21.09	21.66	N/A	50.34	60.75	N/A	0.15	0.00	N/A	
Limited Review:																				
10780 Alexandria, LA MSA	669	11,000	1.70	2,466	10.81	5.98	10.46	11.61	8.37	10.38	45.30	46.49	46.23	31.94	38.57	32.64	0.34	0.60	0.28	
99999 DeRidder-Fort Polk South, LA CSA	183	2,054	0.46	534	0.00	0.00	0.00	0.00	0.00	0.00	46.15	37.70	44.19	53.85	62.30	55.81	0.00	0.00	0.00	
26380 Houma-Thibodaux, LA MSA	1,553	35,529	3.94	4,130	0.00	0.00	0.00	19.46	14.68	23.66	57.69	48.68	50.77	22.84	36.64	25.57	0.00	0.00	0.00	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2017-2018)	3,295	94,167	8.35	12,953	6.88	4.22	6.22	23.12	14.36	19.52	42.27	40.52	44.07	27.63	40.91	30.15	0.10	0.00	0.04	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2019)	2,367	50,865	6.00	N/A	6.60	3.97	N/A	22.44	15.63	N/A	42.32	41.49	N/A	28.54	38.87	N/A	0.10	0.04	N/A	
99999 Lake Charles-Jennings, LA CSA	1,831	39,253	4.64	4,314	5.59	6.06	6.58	28.58	19.55	26.70	33.86	28.84	31.06	31.75	45.28	35.56	0.22	0.27	0.09	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2017-2018)	10,822	284,668	27.43	33,025	7.66	6.02	7.62	20.24	15.62	18.46	31.97	26.68	28.73	39.04	50.55	43.95	1.09	1.14	1.24	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2019)	8,122	158,213	20.59	N/A	7.99	6.59	N/A	20.40	15.81	N/A	31.61	27.22	N/A	38.87	49.04	N/A	1.12	1.34	N/A	
43340 Shreveport-Bossier City, LA MSA	2,232	54,218	5.66	7,142	15.51	9.18	15.33	21.78	17.70	21.93	26.62	27.87	27.57	35.98	45.21	35.10	0.10	0.04	0.07	
Total	39,449	957,637	100.00	85,390	8.20	5.33	7.64	20.47	15.23	18.93	33.87	30.39	32.53	36.89	48.43	40.38	0.57	0.62	0.52	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Louisiana											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
12940 Baton Rouge, LA MSA	7,101	198,998	18.00	15,963	87.85	65.57	34.50	3.73	20.29	8.42	14.14	
99999 Monroe-Ruston, LA CSA (2017-2018)	660	19,216	1.67	4,863	86.73	63.64	31.54	4.48	19.24	8.79	17.12	
99999 Monroe-Ruston, LA CSA (2019)	614	9,456	1.56	N/A	86.66	62.21	N/A	4.38	26.55	8.96	11.24	
Limited Review:												
10780 Alexandria, LA MSA	669	11,000	1.70	2,466	83.47	66.37	36.25	4.60	19.28	11.94	14.35	
99999 DeRidder-Fort Polk South, LA CSA	183	2,054	0.46	534	89.60	69.95	20.60	2.09	8.20	8.31	21.86	
26380 Houma-Thibodaux, LA MSA	1,553	35,529	3.94	4,130	86.30	62.33	22.59	4.76	18.67	8.94	19.00	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2017-2018)	3,295	94,167	8.35	12,953	86.91	64.86	30.43	4.57	16.75	8.52	18.39	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2019)	2,367	50,865	6.00	N/A	87.61	64.77	N/A	4.28	21.46	8.11	13.77	
99999 Lake Charles-Jennings, LA CSA	1,831	39,253	4.64	4,314	86.79	63.30	25.92	3.69	22.77	9.52	13.93	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2017-2018)	10,822	284,668	27.43	33,025	88.72	68.90	34.85	3.96	16.64	7.32	14.46	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2019)	8,122	158,213	20.59	N/A	89.67	70.60	N/A	3.55	18.32	6.79	11.08	
43340 Shreveport-Bossier City, LA MSA	2,232	54,218	5.66	7,142	87.58	65.41	33.67	3.73	19.58	8.69	15.01	
Total	39,449	957,637	100.00	85,390	88.14	67.12	32.73	3.95	18.68	7.91	14.21	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Louisiana																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
12940 Baton Rouge, LA MSA	56	855	10.33	67	3.57	3.57	1.49	14.23	1.79	14.93	36.65	44.64	52.24	45.55	50.00	31.34	0.00	0.00	0.00	
99999 Monroe-Ruston, LA CSA (2017-2018)	26	2,142	4.80	78	3.40	0.00	2.56	7.94	3.85	12.82	29.48	42.31	11.54	58.96	53.85	73.08	0.23	0.00	0.00	
99999 Monroe-Ruston, LA CSA (2019)	19	249	3.51	N/A	5.46	0.00	N/A	7.14	0.00	N/A	24.58	31.58	N/A	62.61	68.42	N/A	0.21	0.00	N/A	
Limited Review :																				
10780 Alexandria, LA MSA	20	216	3.69	61	1.56	0.00	1.64	3.74	0.00	1.64	47.35	75.00	59.02	47.35	25.00	37.70	0.00	0.00	0.00	
99999 DeRidder-Fort Polk South, LA CSA	4	35	0.74	27	0.00	0.00	0.00	0.00	0.00	0.00	39.47	0.00	59.26	60.53	100.00	40.74	0.00	0.00	0.00	
26380 Houma-Thibodaux, LA MSA	40	348	7.38	42	0.00	0.00	0.00	9.18	5.00	14.29	65.31	62.50	59.52	25.51	32.50	26.19	0.00	0.00	0.00	
99999 Lafayette-Opelousas- Morgan City, LA CSA (2017-2018)	88	1,479	16.24	317	2.53	0.00	0.63	17.31	14.77	14.51	54.47	64.77	74.45	25.69	20.45	10.41	0.00	0.00	0.00	
99999 Lafayette-Opelousas- Morgan City, LA CSA (2019)	64	1,236	11.81	N/A	2.34	1.56	N/A	16.96	12.50	N/A	53.80	60.94	N/A	26.90	25.00	N/A	0.00	0.00	N/A	
99999 Lake Charles-Jennings, LA CSA	29	1,268	5.35	61	3.01	0.00	0.00	15.34	13.79	3.28	41.37	41.38	72.13	40.27	44.83	24.59	0.00	0.00	0.00	
99999 New Orleans-Metairie- Hammond, LA-MS (part) CSA (2017-2018)	88	881	16.24	137	4.89	4.55	2.92	17.89	12.50	24.09	41.79	43.18	40.88	34.89	39.77	32.12	0.53	0.00	0.00	
99999 New Orleans-Metairie- Hammond, LA-MS (part) CSA (2019)	68	665	12.55	N/A	4.73	1.47	N/A	17.77	16.18	N/A	41.43	27.94	N/A	35.44	54.41	N/A	0.63	0.00	N/A	
43340 Shreveport-Bossier City, LA MSA	40	1,067	7.38	77	6.79	0.00	1.30	14.09	15.00	16.88	32.96	40.00	59.74	46.16	45.00	22.08	0.00	0.00	0.00	
Total	542	10,441	100.02	867	3.73	1.48	1.27	15.19	10.52	13.96	43.76	48.52	58.02	37.10	39.48	26.76	0.21	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Louisiana											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
12940 Baton Rouge, LA MSA	56	855	10.33	67.00	97.06	82.14	34.33	1.96	8.93	0.98	8.93	
99999 Monroe-Ruston, LA CSA (2017-2018)	26	2,142	4.80	78.00	96.37	80.77	28.21	1.59	15.38	2.04	3.85	
99999 Monroe-Ruston, LA CSA (2019)	19	249	3.51	0.00	96.64	68.42	N/A	1.68	26.32	1.68	5.26	
Limited Review:												
10780 Alexandria, LA MSA	20	216	3.69	61.00	93.46	85.00	54.10	4.36	15.00	2.18	0.00	
99999 DeRidder-Fort Polk South, LA CSA	4	35	0.74	27.00	96.49	25.00	3.70	0.88	0.00	2.63	75.00	
26380 Houma-Thibodaux, LA MSA	40	348	7.38	42.00	95.15	75.00	28.57	3.06	12.50	1.79	12.50	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2017-2018)	88	1,479	16.24	317.00	97.41	68.18	34.38	1.79	11.36	0.80	20.45	
99999 Lafayette-Opelousas-Morgan City, LA CSA (2019)	64	1,236	11.81	0.00	97.60	57.81	N/A	1.75	21.88	0.64	20.31	
99999 Lake Charles-Jennings, LA CSA	29	1,268	5.35	61.00	97.53	72.41	63.93	0.55	13.79	1.92	13.79	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2017-2018)	88	881	16.24	137.00	95.42	78.41	50.36	2.47	3.41	2.11	18.18	
99999 New Orleans-Metairie-Hammond, LA-MS (part) CSA (2019)	68	665	12.55	0.00	96.04	79.41	N/A	2.08	7.35	1.88	13.24	
43340 Shreveport-Bossier City, LA MSA	40	1,067	7.38	77.00	96.86	70.00	51.95	1.64	5.00	1.51	25.00	
Total	542	10,441	100.02	867	96.53	73.25	40.14	2.01	11.07	1.46	15.68	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Massachusetts 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boston-Worcester-Providence, MA-RH-NH-CT CSA (2017-2018)	4,772	2,179,715	39.36	165,075	3.49	2.41	4.98	14.32	14.40	16.04	44.05	37.91	42.64	38.03	44.78	36.16	0.11	0.50	0.18	
99999 Boston-Worcester-Providence, MA-RH-NH-CT CSA (2019)	7,103	3,293,397	58.59	N/A	3.49	3.34	N/A	14.32	14.60	N/A	44.05	40.22	N/A	38.03	41.62	N/A	0.11	0.23	N/A	
Limited Review:																				
38340 Pittsfield, MA MSA	90	27,582	0.74	6,584	3.11	2.22	4.01	10.17	2.22	9.05	55.49	46.67	54.50	31.23	48.89	32.44	0.00	0.00	0.00	
44140 Springfield, MA MSA	159	31,338	1.31	11,552	6.37	3.77	7.82	16.12	11.95	18.95	33.19	35.22	34.38	44.32	49.06	38.85	0.00	0.00	0.00	
Total	12,124	5,532,032	100.00	183,211	3.60	2.97	5.13	14.28	14.39	15.97	43.93	39.29	42.55	38.10	43.01	36.20	0.10	0.33	0.16	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Massachusetts 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boston-Worcester-Providence, MA-RH-NH-CT CSA (2017-2018)	4,772	2,179,715	39.36	165,075	23.47	3.19	5.96	16.22	13.68	17.91	19.44	23.37	23.19	40.87	52.16	40.16	0.00	7.61	12.78	
99999 Boston-Worcester-Providence, MA-RH-NH-CT CSA (2019)	7,103	3,293,397	58.59	N/A	23.47	3.65	N/A	16.22	16.36	N/A	19.44	25.23	N/A	40.87	51.82	N/A	0.00	2.94	N/A	
Limited Review:																				
38340 Pittsfield, MA MSA	90	27,582	0.74	6,584	21.28	0.00	7.75	17.62	11.11	18.32	20.52	8.89	19.96	40.58	71.11	42.22	0.00	8.89	11.76	
44140 Springfield, MA MSA	159	31,338	1.31	11,552	27.23	4.40	8.54	16.51	22.64	24.58	17.57	30.19	22.86	38.69	39.62	27.85	0.00	3.14	16.18	
Total	12,124	5,532,032	100.00	183,211	23.58	3.62	6.18	16.27	16.13	18.34	19.39	25.68	23.05	40.76	54.57	39.46	0.00	4.83	12.96	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Massachusetts																			2017-2019	
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boston-Worcester- Providence, MA-RH-NH-CT CSA (2017-2018)	7,650	89,669	32.68	127,993	7.32	4.77	6.72	14.73	15.62	15.01	37.14	32.09	38.55	40.07	46.51	39.14	0.74	1.01	0.58	
99999 Boston-Worcester- Providence, MA-RH-NH-CT CSA (2019)	14,290	177,869	61.05	N/A	7.25	4.91	N/A	14.89	14.00	N/A	36.64	38.53	N/A	40.50	42.00	N/A	0.72	0.55	N/A	
Limited Review:																				
38340 Pittsfield, MA MSA	616	9,988	2.63	5,016	12.53	9.74	11.44	6.92	9.42	7.06	43.15	43.83	42.94	37.41	37.01	38.56	0.00	0.00	0.00	
44140 Springfield, MA MSA	851	10,210	3.64	9,018	19.69	8.81	17.49	20.50	17.16	20.18	24.15	27.26	25.44	35.66	46.77	36.89	0.00	0.00	0.00	
Total	23,407	287,736	100.00	142,027	7.81	5.14	7.57	14.83	14.53	15.06	36.60	36.16	37.87	40.08	43.52	38.97	0.69	0.67	0.52	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Massachusetts													2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans			
Full Review:														
99999 Boston-Worcester- Providence, MA-RH-NH-CT CSA (2017-2018)	7,650	89,669	32.68	127,993	83.58	66.58	39.92	6.93	17.76	9.49	15.66			
99999 Boston-Worcester- Providence, MA-RH-NH-CT CSA (2019)	14,290	177,869	61.05	N/A	85.20	67.74	N/A	6.10	19.62	8.71	12.64			
Limited Review:														
38340 Pittsfield, MA MSA	616	9,988	2.63	5,016	81.49	67.21	46.29	6.27	23.70	12.24	9.09			
44140 Springfield, MA MSA	851	10,210	3.64	9,018	82.27	62.75	39.52	6.23	26.44	11.50	10.81			
Total	23,407	287,736	100.00	142,027	84.30	67.16	40.12	6.47	19.37	9.22	13.47			

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Massachusetts																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Boston-Worcester-Providence, MA-RI-NH-CT CSA (2017-2018)	26	277	22.22	243	2.80	0.00	2.88	10.59	11.54	7.82	43.74	46.15	40.74	42.80	42.31	48.56	0.07	0.00	0.00	
99999 Boston-Worcester-Providence, MA-RI-NH-CT CSA (2019)	72	752	61.54	N/A	3.10	5.56	N/A	11.05	5.56	N/A	43.80	43.06	N/A	41.97	44.44	N/A	0.08	1.39	N/A	
Limited Review:																				
38340 Pittsfield, MA MSA	10	86	8.55	58	2.24	0.00	0.00	4.48	0.00	0.00	49.02	20.00	41.38	44.26	80.00	58.62	0.00	0.00	0.00	
44140 Springfield, MA MSA	9	89	7.69	20	4.45	0.00	10.00	9.69	0.00	10.00	29.45	22.22	15.00	56.41	77.78	65.00	0.00	0.00	0.00	
Total	117	1,204	100.00	321	3.00	3.42	2.80	10.52	5.98	6.54	43.35	40.17	39.25	43.06	49.57	51.40	0.07	0.85	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Massachusetts												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Boston-Worcester-Providence, MA-RI-NH-CT CSA (2017-2018)	26	277	22.22	243.00	94.66	76.92	51.44	2.96	11.54	2.37	11.54		
99999 Boston-Worcester-Providence, MA-RI-NH-CT CSA (2019)	72	752	61.54	0.00	95.16	69.44	N/A	2.71	25.00	2.13	5.56		
Limited Review:													
38340 Pittsfield, MA MSA	10	86	8.55	58.00	95.24	100.00	48.28	3.08	0.00	1.68	0.00		
44140 Springfield, MA MSA	9	89	7.69	20.00	96.60	55.56	60.00	1.70	33.33	1.70	11.11		
Total	117	1,204	100.00	321	95.01	72.65	51.40	2.79	20.51	2.19	6.84		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Michigan																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	17,711	3,339,729	51.70	156,389	6.30	1.73	2.76	19.42	12.87	14.82	37.56	37.13	39.93	36.60	48.22	42.44	0.12	0.04	0.05	
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	9,578	2,034,151	27.96	N/A	6.30	1.75	N/A	19.42	13.09	N/A	37.56	34.49	N/A	36.60	50.63	N/A	0.12	0.04	N/A	
Limited Review:																				
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	4,061	665,770	11.85	42,449	2.37	1.85	2.38	16.97	13.30	16.62	49.97	48.71	50.75	30.69	36.15	30.26	0.00	0.00	0.00	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	349	60,543	1.02	11,437	5.01	1.43	3.12	14.69	10.60	13.11	47.79	44.99	46.40	32.45	42.98	37.31	0.05	0.00	0.06	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	177	33,149	0.52	N/A	5.01	1.69	N/A	14.69	9.04	N/A	47.79	44.07	N/A	32.45	45.20	N/A	0.05	0.00	N/A	
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	120	12,182	0.35	15,327	2.51	0.83	2.81	16.47	8.33	14.08	50.80	78.33	49.18	30.10	12.50	33.74	0.11	0.00	0.19	
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	351	58,479	1.02	N/A	2.51	1.99	N/A	16.47	13.96	N/A	50.80	39.32	N/A	30.10	44.16	N/A	0.11	0.57	N/A	
99999 Saginaw-Midland-Bay City, MI CSA	230	23,481	0.67	3,768	7.76	2.61	1.73	9.64	3.04	3.95	54.82	66.09	59.45	27.77	28.26	34.87	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	317	86,430	0.93	4,747	5.69	1.89	1.62	13.73	4.73	13.04	49.50	62.78	52.43	31.08	30.60	32.90	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	202	54,977	0.59	N/A	5.69	0.99	N/A	13.73	10.40	N/A	49.50	58.42	N/A	31.08	30.20	N/A	0.00	0.00	N/A	
99999 MI Non-Metro Roll-up	1,162	220,840	3.39	9,239	0.00	0.00	0.00	5.37	4.73	5.37	65.45	52.41	58.39	29.18	42.86	36.24	0.00	0.00	0.00	
Total	34,258	6,589,731	100.00	243,356	5.46	1.69	2.57	18.09	12.51	14.45	41.40	39.12	43.95	34.95	46.64	38.98	0.10	0.04	0.05	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Michigan																		2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	17,711	3,339,729	51.70	156,389	22.98	8.02	9.23	16.63	20.53	19.47	19.06	21.85	22.70	41.34	42.84	36.94	0.00	6.76	11.65	
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	9,578	2,034,151	27.96	N/A	22.98	9.54	N/A	16.63	19.27	N/A	19.06	23.07	N/A	41.34	43.70	N/A	0.00	4.41	N/A	
Limited Review:																				
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	4,061	665,770	11.85	42,449	20.01	9.09	9.32	17.88	23.64	22.61	22.05	23.29	23.33	40.06	37.23	33.53	0.00	6.75	11.21	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	349	60,543	1.02	11,437	20.91	3.72	10.13	17.04	12.03	20.04	19.84	20.63	21.95	42.21	48.42	36.84	0.00	15.19	11.05	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	177	33,149	0.52	N/A	20.91	6.21	N/A	17.04	12.43	N/A	19.84	23.73	N/A	42.21	50.85	N/A	0.00	6.78	N/A	
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	120	12,182	0.35	15,327	20.98	5.83	10.38	17.33	20.83	23.49	20.73	15.00	23.61	40.97	26.67	31.26	0.00	31.67	11.26	
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	351	58,479	1.02	N/A	20.98	0.28	N/A	17.33	3.13	N/A	20.73	2.85	N/A	40.97	5.41	N/A	0.00	0.57	N/A	
99999 Saginaw-Midland-Bay City, MI CSA	230	23,481	0.67	3,768	21.19	3.91	7.46	17.08	12.61	20.70	20.69	19.13	24.20	41.04	35.65	36.60	0.00	28.70	11.04	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	317	86,430	0.93	4,747	22.60	4.10	7.04	17.04	8.83	16.39	19.44	9.15	20.77	40.92	65.93	46.60	0.00	11.99	9.21	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	202	54,977	0.59	N/A	22.60	5.45	N/A	17.04	6.93	N/A	19.44	9.90	N/A	40.92	69.80	N/A	0.00	7.92	N/A	
99999 MI Non-Metro Roll-up	1,162	220,840	3.39	9,239	16.32	4.22	5.79	17.79	14.03	15.56	21.72	18.50	21.12	44.17	51.98	47.98	0.00	11.27	9.55	
Total	34,258	6,589,731	100.00	243,356	22.28	8.89	9.16	16.85	21.37	20.11	19.56	23.58	22.76	41.31	46.15	36.58	0.00	6.56	11.39	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Michigan																		2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	32,817	808,514	42.89	101,645	8.15	5.19	6.95	20.05	14.97	18.70	33.09	33.00	32.46	37.58	46.12	41.00	1.13	0.71	0.89	
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	23,566	473,951	30.80	N/A	8.02	5.55	N/A	19.77	15.65	N/A	32.75	33.09	N/A	38.36	44.90	N/A	1.10	0.81	N/A	
Limited Review:																				
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	10,378	208,743	13.56	19,589	3.86	3.05	4.07	17.81	13.09	16.76	45.89	46.27	46.27	32.44	37.59	32.90	0.00	0.00	0.00	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	879	27,653	1.15	5,051	8.27	4.55	8.26	21.22	17.75	20.95	41.89	36.97	40.88	28.18	40.61	29.80	0.43	0.11	0.12	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	776	19,127	1.01	N/A	8.47	3.74	N/A	22.15	18.94	N/A	42.22	36.98	N/A	26.73	40.34	N/A	0.43	0.00	N/A	
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	1,481	35,788	1.94	6,789	7.83	7.22	8.19	18.49	12.83	18.32	39.86	36.12	38.99	31.26	42.07	32.97	2.56	1.76	1.53	
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	1,082	23,718	1.41	N/A	6.85	5.27	N/A	20.14	18.02	N/A	40.51	36.32	N/A	29.86	39.19	N/A	2.63	1.20	N/A	
99999 Saginaw-Midland-Bay City, MI CSA	842	29,511	1.10	2,213	6.69	6.89	5.24	12.19	8.08	9.17	53.26	52.49	54.59	27.86	32.54	31.00	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	655	18,575	0.86	2,171	10.65	8.09	8.20	12.10	4.27	8.61	45.04	37.40	46.02	32.20	50.23	37.17	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	514	13,892	0.67	N/A	10.45	6.42	N/A	11.57	7.39	N/A	43.92	39.30	N/A	34.06	46.89	N/A	0.00	0.00	N/A	
99999 MI Non-Metro Roll-up	3,529	65,184	4.61	6,222	0.00	0.00	0.00	7.11	7.11	8.08	59.99	50.41	55.37	32.89	42.48	36.55	0.00	0.00	0.00	
Total	76,519	1,724,656	100.00	143,680	7.54	4.84	6.35	19.17	14.42	17.73	36.11	36.12	36.48	36.16	44.01	38.72	1.03	0.61	0.71	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Michigan											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	32,817	808,514	42.89	101,645	82.42	67.62	46.13	7.39	19.30	10.20	13.08	
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	23,566	473,951	30.80	N/A	83.94	71.53	N/A	6.49	19.49	9.57	8.98	
Limited Review:												
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	10,378	208,743	13.56	19,589	80.46	65.54	42.35	7.94	22.22	11.60	12.24	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	879	27,653	1.15	5,051	77.59	62.91	43.18	7.97	22.07	14.44	15.02	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	776	19,127	1.01	N/A	79.40	61.60	N/A	7.20	28.87	13.40	9.54	
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	1,481	35,788	1.94	6,789	78.83	67.12	46.12	6.72	18.84	14.45	14.04	
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	1,082	23,718	1.41	N/A	80.60	69.50	N/A	6.04	19.87	13.37	10.63	
99999 Saginaw-Midland-Bay City, MI CSA	842	29,511	1.10	2,213	75.18	63.42	48.98	7.95	27.43	16.87	9.14	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	655	18,575	0.86	2,171	81.27	62.44	42.51	6.25	24.73	12.47	12.82	
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	514	13,892	0.67	N/A	81.15	67.32	N/A	6.25	24.90	12.60	7.78	
99999 MI Non-Metro Roll-up	3,529	65,184	4.61	6,222	81.76	68.80	47.91	6.07	19.95	12.17	11.25	
Total	76,519	1,724,656	100.00	143,680	82.36	68.40	45.58	6.96	20.09	10.68	11.51	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Michigan																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	240	3,522	24.95	427	4.51	0.00	0.70	16.93	10.42	13.11	45.03	46.67	51.29	33.36	42.92	34.43	0.18	0.00	0.47	
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	157	2,519	16.32	N/A	4.61	0.64	N/A	16.53	10.83	N/A	44.53	46.50	N/A	34.10	40.76	N/A	0.22	1.27	N/A	
Limited Review :																				
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	192	1,970	19.96	403	1.35	1.04	0.50	15.08	9.90	13.40	52.02	53.65	58.06	31.55	35.42	28.04	0.00	0.00	0.00	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	21	184	2.18	96	2.33	0.00	0.00	9.66	9.52	6.25	57.49	66.67	67.71	30.41	23.81	26.04	0.11	0.00	0.00	
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	25	276	2.60	N/A	2.89	0.00	N/A	10.49	20.00	N/A	58.24	52.00	N/A	28.16	28.00	N/A	0.21	0.00	N/A	
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	50	399	5.20	256	1.96	2.00	0.78	6.32	0.00	2.34	66.08	74.00	73.44	25.08	24.00	23.44	0.57	0.00	0.00	
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	34	312	3.53	N/A	1.51	0.00	N/A	7.39	0.00	N/A	63.72	70.59	N/A	26.77	29.41	N/A	0.61	0.00	N/A	
99999 Saginaw -Midland-Bay City, MI CSA	21	180	2.18	116	1.14	0.00	0.00	2.84	0.00	0.00	60.23	57.14	58.62	35.80	42.86	41.38	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2017-2018)	26	673	2.70	100	1.74	0.00	0.00	6.42	0.00	1.00	70.49	73.08	71.00	21.35	26.92	28.00	0.00	0.00	0.00	
99999 South Bend-Elkhart-Mishaw aka, IN-MI CSA (2019)	31	479	3.22	N/A	1.78	0.00	N/A	7.12	9.68	N/A	67.26	64.52	N/A	23.84	25.81	N/A	0.00	0.00	N/A	
99999 MI Non-Metro Roll-up	165	2,510	17.15	275	0.00	0.00	0.00	1.67	0.61	0.00	72.82	72.12	88.36	25.51	27.27	11.64	0.00	0.00	0.00	
Total	962	13,024	99.99	1,673	3.34	0.42	0.42	13.36	7.48	7.35	51.69	56.76	65.03	31.39	35.14	27.08	0.20	0.21	0.12	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Michigan 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Detroit-Warren-Ann Arbor, MI CSA (2017-2018)	240	3,522	24.95	427.00	95.53	75.83	44.96	2.80	14.17	1.67	10.00
99999 Detroit-Warren-Ann Arbor, MI CSA (2019)	157	2,519	16.32	0.00	95.51	80.25	N/A	2.74	12.10	1.75	7.64
Limited Review:											
99999 Grand Rapids-Kentwood-Muskegon, MI CSA	192	1,970	19.96	403.00	93.54	62.50	39.21	4.94	18.75	1.51	18.75
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2017-2018)	21	184	2.18	96.00	93.34	80.95	33.33	4.33	9.52	2.33	9.52
99999 Kalamazoo-Battle Creek-Portage, MI CSA (2019)	25	276	2.60	0.00	93.25	60.00	N/A	4.60	28.00	2.14	12.00
99999 Lansing-East Lansing-Owosso, MI CSA (2017-2018)	50	399	5.20	256.00	96.21	68.00	26.17	2.15	6.00	1.64	26.00
99999 Lansing-East Lansing-Owosso, MI CSA (2019)	34	312	3.53	0.00	96.37	76.47	N/A	2.18	8.82	1.45	14.71
99999 Saginaw -Midland-Bay City, MI CSA	21	180	2.18	116.00	96.78	90.48	55.17	1.52	4.76	1.70	4.76
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2017-2018)	26	673	2.70	100.00	96.01	69.23	32.00	3.65	19.23	0.35	11.54
99999 South Bend-Elkhart-Mishawaka, IN-MI CSA (2019)	31	479	3.22	N/A	95.73	67.74	N/A	3.74	12.90	0.53	19.35
99999 MI Non-Metro Roll-up	165	2,510	17.15	275.00	96.84	71.52	36.00	2.29	16.97	0.87	11.52
Total	962	13,024	99.99	1,673	95.40	72.35	38.49	2.99	14.76	1.60	12.89

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Nevada 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
29820 Las Vegas-Henderson-Paradise, NV MSA	8,641	2,199,879	97.86	93,068	1.90	1.33	1.62	16.89	11.10	14.25	41.70	38.41	42.78	39.49	49.10	41.30	0.01	0.06	0.06	
Limited Review:																				
99999 Reno-Carson City-Fernley, NV CSA	189	80,779	2.14	2,169	0.00	0.00	0.00	3.39	3.17	1.06	55.01	37.57	57.17	41.59	59.26	41.77	0.00	0.00	0.00	
Total	8,830	2,280,658	100.00	95,237	1.83	1.30	1.58	16.42	10.93	13.95	42.17	38.39	43.10	39.57	49.32	41.31	0.01	0.06	0.05	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Nevada 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
29820 Las Vegas-Henderson-Paradise, NV MSA	8,641	2,199,879	97.86	93,068	20.67	5.18	4.44	18.35	18.53	14.86	20.51	20.91	22.15	40.47	50.55	38.93	0.00	4.83	19.62	
Limited Review:																				
99999 Reno-Carson City-Fernley, NV CSA	189	80,779	2.14	2,169	17.28	2.65	4.01	15.76	5.29	13.09	22.15	10.58	21.21	44.82	75.66	50.95	0.00	5.82	10.74	
Total	8,830	2,280,658	100.00	95,237	20.57	5.39	4.43	18.28	19.17	14.82	20.56	21.74	22.13	40.59	53.69	39.20	0.00	4.85	19.42	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Nevada																			2017-2019	
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
29820 Las Vegas-Henderson-Paradise, NV MSA	21,358	369,810	98.38	46,625	3.64	2.28	2.96	21.34	14.16	18.74	38.19	36.56	37.54	36.24	46.65	40.41	0.58	0.35	0.35	
Limited Review:																				
99999 Reno-Carson City-Fernley, NV CSA	352	4,258	1.62	1,566	0.00	0.00	0.00	2.09	0.00	1.98	54.85	49.72	48.85	43.06	50.28	49.17	0.00	0.00	0.00	
Total	21,710	374,068	100.00	48,191	3.55	2.24	2.87	20.86	13.93	18.20	38.61	36.77	37.90	36.41	46.71	40.69	0.57	0.34	0.34	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Nevada													2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans			
Full Review:														
29820 Las Vegas-Henderson-Paradise, NV MSA	21,358	369,810	98.38	46,625	86.59	67.53	44.76	4.62	18.82	8.79	13.64			
Limited Review:														
99999 Reno-Carson City-Fernley, NV CSA	352	4,258	1.62	1,566	84.91	66.48	50.70	5.87	19.03	9.22	14.49			
Total	21,710	374,068	100.00	48,191	86.54	67.52	44.95	4.65	18.83	8.80	13.66			

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Nevada																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
29820 Las Vegas-Henderson-Paradise, NV MSA	64	795	87.67	62	2.35	3.13	1.61	19.89	25.00	14.52	41.26	28.13	25.81	36.45	43.75	58.06	0.05	0.00	0.00	
Limited Review:																				
99999 Reno-Carson City-Fernley, NV CSA	9	110	12.33	27	0.00	0.00	0.00	3.64	0.00	3.70	38.79	0.00	25.93	57.58	100.00	70.37	0.00	0.00	0.00	
Total	73	905	100.00	89	2.16	2.74	1.12	18.55	21.92	11.24	41.05	24.66	25.84	38.20	50.68	61.80	0.05	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Nevada												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
29820 Las Vegas-Henderson-Paradise, NV MSA	64	795	87.67	62.00	93.88	89.06	64.52	3.72	6.25	2.40	4.69		
Limited Review:													
99999 Reno-Carson City-Fernley, NV CSA	9	110	12.33	27.00	97.58	66.67	55.56	1.82	22.22	0.61	11.11		
Total	73	905	100.00	89	94.19	86.30	61.80	3.56	8.22	2.26	5.48		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - New York 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Rochester-Batavia-Seneca Falls, NY CSA	1,506	217,628	52.57	27,036	3.85	1.93	3.00	11.92	9.30	10.87	47.99	43.29	47.50	36.21	45.48	38.61	0.03	0.00	0.02	
Limited Review:																				
99999 NM NY - Sullivan County RU	160	28,546	5.58	1,329	0.00	0.00	0.00	13.19	13.13	11.59	67.17	65.00	67.12	19.64	21.88	21.29	0.00	0.00	0.00	
99999 Syracuse-Auburn, NY CSA	1,199	157,456	41.85	15,367	2.63	2.59	1.97	13.98	15.93	12.70	51.67	47.79	50.59	31.61	33.69	34.63	0.12	0.00	0.11	
Total	2,865	403,630	100.00	43,732	3.21	2.09	2.55	12.77	12.29	11.54	50.23	46.39	49.18	33.73	39.23	36.68	0.06	0.00	0.05	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - New York 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Rochester-Batavia-Seneca Falls, NY CSA	1,506	217,628	52.57	27,036	21.60	7.64	8.46	16.83	20.05	21.39	19.77	21.58	22.10	41.80	40.70	34.58	0.00	10.03	13.47	
Limited Review:																				
99999 NM NY - Sullivan County RU	160	28,546	5.58	1,329	20.46	1.25	4.06	16.52	7.50	12.04	21.27	20.63	19.86	41.75	58.75	52.67	0.00	11.88	11.36	
99999 Syracuse-Auburn, NY CSA	1,199	157,456	41.85	15,367	21.85	7.92	9.85	17.15	24.94	22.50	20.40	20.52	22.97	40.60	33.69	34.84	0.00	12.93	9.85	
Total	2,865	403,630	100.00	43,732	21.65	8.35	8.82	16.94	24.13	21.50	20.08	23.78	22.34	41.33	43.74	35.22	0.00	11.34	12.13	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - New York 2017-2019

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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
99999 Rochester-Batavia-Seneca Falls, NY CSA	7,915	118,696	65.65	16,406	9.95	6.84	8.27	13.83	9.22	13.01	41.17	38.38	40.05	34.84	45.51	38.56	0.21	0.05	0.12	
Limited Review:																				
99999 NM NY - Sullivan County RU	599	9,755	4.97	1,433	0.00	0.00	0.00	27.89	21.87	24.01	56.01	51.92	54.01	16.11	26.21	21.98	0.00	0.00	0.00	
99999 Syracuse-Auburn, NY CSA	3,542	81,137	29.38	10,326	7.97	6.04	6.77	14.36	12.20	12.37	43.78	41.36	43.59	31.48	38.90	35.39	2.41	1.50	1.89	
Total	12,056	209,588	100.00	28,165	8.79	6.26	7.30	14.59	10.72	13.33	42.77	39.93	42.06	32.79	42.61	36.55	1.06	0.47	0.76	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - New York 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Rochester-Batavia-Seneca Falls, NY CSA	7,915	118,696	65.65	16,406	82.02	67.20	43.93	6.66	19.70	11.33	13.10
Limited Review:											
99999 NM NY - Sullivan County RU	599	9,755	4.97	1,433	82.72	71.12	45.64	5.19	14.69	12.09	14.19
99999 Syracuse-Auburn, NY CSA	3,542	81,137	29.38	10,326	79.92	62.93	44.05	6.65	23.60	13.43	13.47
Total	12,056	209,588	100.00	28,165	81.23	66.14	44.06	6.60	20.60	12.17	13.26

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - New York																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Rochester-Batavia-Seneca Falls, NY CSA	153	1,299	58.62	341	2.09	1.31	0.59	9.28	3.92	14.96	58.10	66.01	73.31	30.47	28.76	11.14	0.05	0.00	0.00	
Limited Review:																				
99999 NM NY - Sullivan County RU	28	329	10.73	28	0.00	0.00	0.00	13.89	10.71	7.14	73.33	85.71	85.71	12.78	3.57	7.14	0.00	0.00	0.00	
99999 Syracuse-Auburn, NY CSA	80	777	30.65	148	2.33	0.00	0.68	11.80	2.50	10.14	53.50	55.00	70.27	31.80	41.25	18.24	0.57	1.25	0.68	
Total	261	2,405	100.00	517	2.08	0.77	0.58	10.55	4.21	13.15	57.01	64.75	73.11	30.10	29.89	12.96	0.26	0.38	0.19	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - New York												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Rochester-Batavia-Seneca Falls, NY CSA	153	1,299	58.62	341.00	94.80	75.82	50.15	3.49	10.46	1.72	13.73		
Limited Review:													
99999 NM NY - Sullivan County RU	28	329	10.73	28.00	97.22	75.00	57.14	2.78	14.29	0.00	10.71		
99999 Syracuse-Auburn, NY CSA	80	777	30.65	148.00	95.19	66.25	47.97	2.90	22.50	1.91	11.25		
Total	261	2,405	100.00	517	95.09	72.80	49.90	3.21	14.56	1.71	12.64		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Ohio																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Full Review:																					
99999 Columbus-Marion-Zanesville, OH CSA	12,862	2,526,869	42.06	74,447	5.18	3.16	4.40	18.67	12.49	16.88	38.05	32.10	35.97	38.10	52.23	42.72	0.01	0.02	0.03		
Limited Review:																					
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	7,008	1,021,661	22.92	99,942	5.99	2.17	2.82	15.66	12.10	12.08	43.03	44.79	44.06	35.20	40.94	41.01	0.12	0.00	0.03		
99999 Cleveland-Akron-Canton, OH CSA (2019)	3,657	600,151	11.96	N/A	5.99	2.05	N/A	15.66	8.31	N/A	43.03	40.80	N/A	35.20	48.84	N/A	0.12	0.00	N/A		
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	1,182	154,781	3.87	27,068	5.36	1.61	2.74	16.86	11.34	14.48	45.76	43.57	46.55	32.03	43.49	36.23	0.00	0.00	0.00		
99999 Dayton-Springfield-Sidney, OH CSA (2019)	691	98,865	2.26	N/A	5.36	3.47	N/A	16.86	10.42	N/A	45.76	42.84	N/A	32.03	43.27	N/A	0.00	0.00	N/A		
99999 Lima-Van Wert-Celina, OH CSA	282	31,316	0.92	2,604	2.68	0.35	1.88	12.82	9.22	8.60	52.65	43.97	51.92	31.85	46.45	37.60	0.00	0.00	0.00		
99999 Mansfield-Ashland-Bucyrus, OH CSA	246	25,032	0.80	2,981	2.15	0.00	0.67	13.59	10.57	9.12	57.94	62.60	59.68	26.32	26.83	30.53	0.00	0.00	0.00		
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	103	8,141	0.34	1,379	2.53	0.97	1.16	8.22	5.83	6.96	78.37	74.76	79.33	10.88	18.45	12.55	0.00	0.00	0.00		
99999 Toledo-Findlay-Tiffin, OH CSA	783	119,569	2.56	14,196	7.44	1.28	2.46	13.08	6.26	9.24	42.91	40.23	42.53	36.57	52.23	45.77	0.00	0.00	0.00		
99999 Youngstown-Warren, OH-PA CSA	1,027	114,747	3.36	11,417	5.69	1.07	1.29	13.64	8.37	8.71	49.51	49.56	53.39	31.16	40.99	36.61	0.00	0.00	0.00		
99999 OH Non-Metro Roll-up	2,738	313,986	8.95	22,690	0.84	0.51	0.52	10.58	11.18	11.62	62.07	54.57	60.92	26.44	33.67	26.87	0.07	0.07	0.07		
Total	30,579	5,015,118	100.00	256,724	5.30	2.33	2.94	15.56	11.32	13.28	45.04	40.04	44.25	34.03	46.29	39.51	0.07	0.02	0.03		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Ohio																		2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Full Review:																			
99999 Columbus-Marion-Zanesville, OH CSA	12,862	2,526,869	42.06	74,447	22.26	6.90	7.77	17.12	18.25	18.54	19.59	18.55	20.97	41.03	38.12	38.01	0.00	18.18	14.71
Limited Review:																			
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	7,008	1,021,661	22.92	99,942	22.05	8.79	9.52	16.98	24.17	19.88	19.97	21.13	21.60	41.00	35.83	36.04	0.00	10.07	12.96
99999 Cleveland-Akron-Canton, OH CSA (2019)	3,657	600,151	11.96	N/A	22.05	8.94	N/A	16.98	20.43	N/A	19.97	22.48	N/A	41.00	42.88	N/A	0.00	5.28	N/A
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	1,182	154,781	3.87	27,068	22.32	7.02	8.50	17.04	17.26	20.16	19.77	22.00	22.12	40.87	37.73	37.43	0.00	15.99	11.79
99999 Dayton-Springfield-Sidney, OH CSA (2019)	691	98,865	2.26	N/A	22.32	7.67	N/A	17.04	20.69	N/A	19.77	25.33	N/A	40.87	41.53	N/A	0.00	4.78	N/A
99999 Lima-Van Wert-Celina, OH CSA	282	31,316	0.92	2,604	21.74	8.87	9.79	17.04	20.57	22.50	21.57	29.08	25.04	39.66	28.72	32.14	0.00	12.77	10.52
99999 Mansfield-Ashland-Bucyrus, OH CSA	246	25,032	0.80	2,981	20.58	8.54	9.36	18.49	20.33	20.56	20.92	22.76	25.36	40.02	34.96	30.96	0.00	13.41	13.75
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	103	8,141	0.34	1,379	19.59	6.80	9.35	18.78	20.39	23.35	21.83	21.36	25.89	39.80	26.21	30.67	0.00	25.24	10.73
99999 Toledo-Findlay-Tiffin, OH CSA	783	119,569	2.56	14,196	23.82	5.49	9.43	16.38	17.62	20.21	19.31	22.35	22.94	40.49	42.15	35.88	0.00	12.39	11.54
99999 Youngstown-Warren, OH-PA CSA	1,027	114,747	3.36	11,417	21.19	6.13	9.74	18.00	20.64	21.77	20.50	26.68	24.54	40.31	32.91	31.26	0.00	13.63	12.68
99999 OH Non-Metro Roll-up	2,738	313,986	8.95	22,690	19.04	7.56	7.90	18.02	19.65	22.72	21.67	23.27	23.35	41.27	34.44	33.79	0.00	15.08	12.24
Total	30,579	5,015,118	100.00	256,724	21.89	8.85	8.77	17.13	23.33	19.93	20.05	24.15	21.93	40.93	43.68	36.21	0.00	13.75	13.16

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Ohio																			2017-2019		
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate		
Full Review:																					
99999 Columbus-Marion-Zanesville, OH CSA	26,588	555,444	36.67	36,756	9.04	5.75	13.16	18.26	11.89	14.95	31.15	27.57	28.12	41.08	54.49	43.43	0.47	0.29	0.33		
Limited Review:																					
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	16,032	376,671	22.11	57,111	8.38	4.69	7.25	14.91	11.02	14.01	37.18	35.15	35.82	38.70	48.65	42.24	0.83	0.49	0.67		
99999 Cleveland-Akron-Canton, OH CSA (2019)	12,214	228,155	16.84	N/A	8.34	5.16	N/A	15.05	10.82	N/A	37.00	35.10	N/A	38.80	48.34	N/A	0.81	0.59	N/A		
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	3,172	74,892	4.37	12,990	6.93	4.92	6.73	18.68	13.52	18.36	42.71	38.49	41.85	31.63	43.06	33.06	0.04	0.00	0.01		
99999 Dayton-Springfield-Sidney, OH CSA (2019)	2,406	40,434	3.32	N/A	6.96	5.78	N/A	18.36	12.88	N/A	42.64	39.65	N/A	32.01	41.69	N/A	0.03	0.00	N/A		
99999 Lima-Van Wert-Celina, OH CSA	737	23,405	1.02	1,163	4.78	5.29	4.30	19.20	15.47	17.97	44.31	41.79	45.31	31.71	37.45	32.42	0.00	0.00	0.00		
99999 Mansfield-Ashland-Bucyrus, OH CSA	851	19,968	1.17	1,619	9.00	7.87	8.96	14.99	9.05	15.32	48.36	56.17	49.60	27.65	26.91	26.13	0.00	0.00	0.00		
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	191	4,597	0.26	826	1.97	0.00	1.09	18.33	6.81	18.64	63.95	63.87	69.25	15.76	29.32	11.02	0.00	0.00	0.00		
99999 Toledo-Findlay-Tiffin, OH CSA	1,917	30,537	2.64	7,012	13.22	8.19	10.95	10.92	8.92	10.61	36.00	29.58	33.21	39.75	53.31	45.18	0.11	0.00	0.04		
99999 Youngstown-Warren, OH-PA CSA	2,613	46,149	3.60	6,551	8.43	5.01	7.66	13.04	10.07	11.86	40.32	37.93	38.88	38.21	47.00	41.60	0.00	0.00	0.00		
99999 OH Non-Metro Roll-up	5,793	118,750	7.99	12,149	1.45	0.69	0.91	16.39	12.95	13.07	57.84	58.02	59.60	23.42	27.53	25.94	0.90	0.81	0.49		
Total	72,514	1,519,002	99.99	136,177	7.99	5.02	8.40	15.95	11.55	14.40	38.47	34.83	36.90	37.01	48.22	39.89	0.59	0.38	0.42		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Ohio											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Columbus-Marion-Zanesville, OH CSA	26,588	555,444	36.67	36,756	83.85	69.84	42.72	5.26	18.41	10.88	11.75	
Limited Review:												
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	16,032	376,671	22.11	57,111	81.42	65.34	46.66	7.42	21.13	11.16	13.52	
99999 Cleveland-Akron-Canton, OH CSA (2019)	12,214	228,155	16.84	N/A	83.01	67.59	N/A	6.60	22.02	10.38	10.40	
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	3,172	74,892	4.37	12,990	79.27	65.67	46.10	6.95	19.92	13.78	14.41	
99999 Dayton-Springfield-Sidney, OH CSA (2019)	2,406	40,434	3.32	N/A	81.15	67.29	N/A	6.22	21.61	12.63	11.10	
99999 Lima-Van Wert-Celina, OH CSA	737	23,405	1.02	1,163	76.77	63.77	34.65	6.96	25.24	16.28	10.99	
99999 Mansfield-Ashland-Bucyrus, OH CSA	851	19,968	1.17	1,619	79.01	64.63	47.19	5.98	24.79	15.01	10.58	
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	191	4,597	0.26	826	79.24	70.68	38.98	5.23	17.28	15.52	12.04	
99999 Toledo-Findlay-Tiffin, OH CSA	1,917	30,537	2.64	7,012	79.55	62.60	45.68	7.26	23.79	13.20	13.62	
99999 Youngstown-Warren, OH-PA CSA	2,613	46,149	3.60	6,551	81.05	64.29	44.37	6.38	24.38	12.57	11.33	
99999 OH Non-Metro Roll-up	5,793	118,750	7.99	12,149	78.81	66.11	46.00	6.65	22.01	14.54	11.88	
Total	72,514	1,519,002	99.99	136,177	81.82	67.39	45.18	6.58	20.58	11.61	12.03	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Ohio																		2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
99999 Columbus-Marion-Zanesville, OH CSA	358	7,593	30.47	553	4.48	1.12	1.08	14.89	12.85	11.39	46.78	53.35	60.94	33.76	32.68	26.22	0.09	0.00	0.36	
Limited Review :																				
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	133	1,132	11.32	392	3.43	1.50	2.04	9.64	3.76	4.34	48.85	48.12	59.44	38.00	46.62	34.18	0.09	0.00	0.00	
99999 Cleveland-Akron-Canton, OH CSA (2019)	96	1,070	8.17	N/A	3.62	1.04	N/A	10.14	4.17	N/A	47.79	55.21	N/A	38.35	39.58	N/A	0.10	0.00	N/A	
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	61	1,243	5.19	305	3.04	0.00	0.33	12.57	1.64	5.57	52.74	70.49	58.69	31.65	27.87	35.41	0.00	0.00	0.00	
99999 Dayton-Springfield-Sidney, OH CSA (2019)	52	554	4.43	N/A	3.23	0.00	N/A	13.28	9.62	N/A	51.84	36.54	N/A	31.65	53.85	N/A	0.00	0.00	N/A	
99999 Lima-Van Wert-Celina, OH CSA	24	228	2.04	128	0.61	0.00	0.00	5.21	0.00	0.78	75.77	79.17	87.50	18.40	20.83	11.72	0.00	0.00	0.00	
99999 Mansfield-Ashland-Bucyrus, OH CSA	16	149	1.36	73	1.13	0.00	2.74	4.80	0.00	0.00	65.82	75.00	78.08	28.25	25.00	19.18	0.00	0.00	0.00	
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	1	6	0.09	20	0.82	0.00	0.00	4.10	0.00	0.00	85.25	0.00	100.00	9.84	100.00	0.00	0.00	0.00	0.00	
99999 Toledo-Findlay-Tiffin, OH CSA	42	794	3.57	191	4.67	0.00	0.52	7.57	0.00	3.14	45.33	35.71	57.59	42.43	64.29	38.74	0.00	0.00	0.00	
99999 Youngstown-Warren, OH-PA CSA	47	441	4.00	112	2.51	0.00	0.00	7.52	6.38	3.57	49.29	29.79	47.32	40.68	63.83	49.11	0.00	0.00	0.00	
99999 OH Non-Metro Roll-up	345	6,259	29.36	1,247	0.21	0.00	0.24	4.09	2.90	1.04	60.14	62.32	68.48	35.52	34.78	30.23	0.04	0.00	0.00	
Total	1,175	19,469	100.00	3,021	2.97	0.60	0.70	9.81	6.30	4.01	51.36	54.89	64.71	35.80	38.21	30.52	0.06	0.00	0.07	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Ohio											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Columbus-Marion-Zanesville, OH CSA	358	7,593	30.47	553.00	95.88	71.51	47.38	2.54	11.17	1.58	17.32	
Limited Review:												
99999 Cleveland-Akron-Canton, OH CSA (2017-2018)	133	1,132	11.32	392.00	95.92	77.44	66.84	2.41	9.02	1.67	13.53	
99999 Cleveland-Akron-Canton, OH CSA (2019)	96	1,070	8.17	0.00	95.98	81.25	N/A	2.45	4.17	1.58	14.58	
99999 Dayton-Springfield-Sidney, OH CSA (2017-2018)	61	1,243	5.19	305.00	96.06	75.41	57.38	2.66	9.84	1.28	14.75	
99999 Dayton-Springfield-Sidney, OH CSA (2019)	52	554	4.43	0.00	96.13	84.62	N/A	2.50	3.85	1.37	11.54	
99999 Lima-Van Wert-Celina, OH CSA	24	228	2.04	128.00	97.85	79.17	62.50	1.53	12.50	0.61	8.33	
99999 Mansfield-Ashland-Bucyrus, OH CSA	16	149	1.36	73.00	97.46	81.25	54.79	1.69	18.75	0.85	0.00	
99999 Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	1	6	0.09	20.00	98.36	100.00	60.00	0.82	0.00	0.82	0.00	
99999 Toledo-Findlay-Tiffin, OH CSA	42	794	3.57	191.00	94.81	80.95	75.39	3.63	9.52	1.56	9.52	
99999 Youngstown-Warren, OH-PA CSA	47	441	4.00	112.00	97.27	80.85	66.07	1.42	6.38	1.31	12.77	
99999 OH Non-Metro Roll-up	345	6,259	29.36	1,247.00	97.88	75.07	58.70	1.27	11.88	0.84	13.04	
Total	1,175	19,469	100.00	3,021	96.36	75.83	58.95	2.25	10.04	1.40	14.13	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Oklahoma 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Oklahoma City-Shawnee, OK CSA	2,085	381,593	65.38	37,113	3.88	1.68	2.04	19.32	15.83	15.15	40.36	32.90	38.83	36.37	49.59	43.82	0.07	0.00	0.15	
Limited Review:																				
99999 Tulsa-Muskogee-Bartlesville, OK CSA	1,104	207,645	34.62	17,866	4.54	0.18	1.60	20.51	13.86	14.64	32.87	35.05	34.78	42.07	50.91	48.99	0.00	0.00	0.00	
Total	3,189	589,238	100.00	54,979	4.11	1.16	1.90	19.74	15.15	14.99	37.72	33.65	37.51	38.38	50.05	45.50	0.05	0.00	0.10	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Oklahoma 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Oklahoma City-Shawnee, OK CSA	2,085	381,593	65.38	37,113	21.47	7.91	5.93	17.30	18.27	16.54	20.33	18.23	18.55	40.91	42.83	32.13	0.00	12.76	26.85	
Limited Review:																				
99999 Tulsa-Muskogee-Bartlesville, OK CSA	1,104	207,645	34.62	17,866	22.03	6.70	5.93	16.92	15.94	15.71	19.62	15.85	17.72	41.43	46.65	36.50	0.00	14.86	24.15	
Total	3,189	589,238	100.00	54,979	21.67	8.66	5.93	17.16	20.19	16.27	20.07	20.12	18.28	41.09	51.03	33.55	0.00	13.48	25.97	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Oklahoma																			2017-2019		
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	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate	% of Business- ses	% Bank Loans	% Aggregate		
Full Review:																					
99999 Oklahoma City-Shawnee, OK CSA	12,344	191,890	66.34	19,662	4.49	3.50	5.01	21.80	15.93	20.55	34.79	31.88	34.08	35.73	46.39	37.68	3.20	2.31	2.68		
Limited Review:																					
99999 Tulsa-Muskogee- Bartlesville, OK CSA	6,264	88,359	33.66	12,290	3.88	2.81	3.55	21.64	15.41	21.33	34.02	32.57	33.68	40.46	49.22	41.44	0.00	0.00	0.00		
Total	18,608	280,249	100.00	31,952	4.25	3.27	4.45	21.74	15.75	20.85	34.49	32.11	33.93	37.56	47.34	39.12	1.96	1.53	1.65		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Oklahoma													2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans			
Full Review:														
99999 Oklahoma City-Shawnee, OK CSA	12,344	191,890	66.34	19,662	86.95	69.01	46.11	4.33	20.10	8.72	10.90			
Limited Review:														
99999 Tulsa-Muskogee- Bartlesville, OK CSA	6,264	88,359	33.66	12,290	86.12	64.61	41.19	5.20	23.21	8.67	12.18			
Total	18,608	280,249	100.00	31,952	86.63	67.52	44.22	4.67	21.15	8.70	11.33			

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Oklahoma 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Oklahoma City-Shaw nee, OK CSA	150	1,877	76.92	379	3.42	0.67	1.58	17.34	3.33	4.75	39.67	36.67	58.84	38.63	59.33	34.04	0.93	0.00	0.79	
Limited Review:																				
99999 Tulsa-Muskogee-Bartlesville, OK CSA	45	395	23.08	66	3.64	2.22	1.52	17.31	4.44	9.09	38.59	46.67	36.36	40.47	46.67	53.03	0.00	0.00	0.00	
Total	195	2,272	100.00	445	3.50	1.03	1.57	17.33	3.59	5.39	39.29	38.97	55.51	39.29	56.41	36.85	0.60	0.00	0.67	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Oklahoma 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Oklahoma City-Shaw nee, OK CSA	150	1,877	76.92	379.00	96.84	84.00	69.92	1.60	6.67	1.56	9.33
Limited Review:											
99999 Tulsa-Muskogee-Bartlesville, OK CSA	45	395	23.08	66.00	95.76	88.89	56.06	1.75	4.44	2.49	6.67
Total	195	2,272	100.00	445	96.45	85.13	67.87	1.65	6.15	1.89	8.72

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Medford-Grants Pass, OR CSA (2017-2018)	478	106,359	14.26	10,317	0.13	0.00	0.37	10.58	12.55	11.80	61.23	56.07	58.56	28.05	31.38	29.27	0.00	0.00	0.00	
99999 Medford-Grants Pass, OR CSA (2019)	390	97,452	11.64	N/A	0.13	0.00	N/A	10.58	14.10	N/A	61.23	51.28	N/A	28.05	34.62	N/A	0.00	0.00	N/A	
Limited Review:																				
99999 Bend-Prineville, OR CSA	1,022	347,013	30.50	10,460	0.00	0.00	0.00	19.09	18.00	18.45	59.12	55.48	60.64	21.79	26.52	20.91	0.00	0.00	0.00	
21660 Eugene-Springfield, OR MSA	875	323,641	26.11	12,553	0.85	2.86	1.15	16.94	17.71	17.97	57.21	52.80	57.86	24.99	26.63	23.02	0.00	0.00	0.00	
99999 OR Non-Metro Roll-up	586	123,462	17.49	11,199	0.54	0.34	0.40	8.77	7.17	8.23	80.23	77.47	79.03	10.46	15.02	12.33	0.00	0.00	0.00	
Total	3,351	997,927	100.00	44,529	0.39	0.81	0.51	12.55	14.80	14.20	64.96	58.22	64.00	22.11	26.17	21.29	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Medford-Grants Pass, OR CSA (2017-2018)	478	106,359	14.26	10,317	20.63	2.51	3.16	18.55	16.32	12.78	19.61	22.38	22.89	41.20	52.72	48.93	0.00	6.07	12.24	
99999 Medford-Grants Pass, OR CSA (2019)	390	97,452	11.64	N/A	20.63	1.79	N/A	18.55	19.23	N/A	19.61	20.00	N/A	41.20	55.38	N/A	0.00	3.59	N/A	
Limited Review:																				
99999 Bend-Prineville, OR CSA	1,022	347,013	30.50	10,460	21.72	4.01	3.33	18.72	13.41	12.35	19.79	18.88	22.05	39.78	60.67	52.49	0.00	3.03	9.79	
21660 Eugene-Springfield, OR MSA	875	323,641	26.11	12,553	21.42	2.97	4.40	17.83	15.66	15.19	20.46	21.94	23.47	40.30	50.06	45.42	0.00	9.37	11.53	
99999 OR Non-Metro Roll-up	586	123,462	17.49	11,199	21.59	5.12	4.25	19.04	10.92	14.19	20.63	17.92	23.01	38.73	53.58	45.73	0.00	12.46	12.82	
Total	3,351	997,927	100.00	44,529	21.18	3.72	3.82	18.53	15.73	13.71	20.08	21.62	22.89	40.21	58.94	47.97	0.00	6.83	11.61	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

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	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	
Full Review:																				
99999 Medford-Grants Pass, OR CSA (2017-2018)	1,451	19,580	15.59	5,810	4.36	3.31	4.04	16.61	12.68	14.37	55.96	54.31	56.30	23.07	29.70	25.28	0.00	0.00	0.00	
99999 Medford-Grants Pass, OR CSA (2019)	1,221	16,778	13.12	N/A	4.08	2.21	N/A	16.61	13.43	N/A	56.04	53.56	N/A	23.27	30.79	N/A	0.00	0.00	N/A	
Limited Review:																				
99999 Bend-Prineville, OR CSA	2,536	33,989	27.25	5,972	0.00	0.00	0.00	31.32	27.29	29.02	43.30	39.94	43.49	25.38	32.77	27.49	0.00	0.00	0.00	
21660 Eugene-Springfield, OR MSA	2,711	36,944	29.13	6,623	5.66	6.53	5.71	24.13	21.80	24.85	47.63	46.59	46.69	22.58	25.08	22.75	0.00	0.00	0.00	
99999 OR Non-Metro Roll-up	1,387	16,504	14.90	5,612	0.97	1.66	0.77	13.17	13.05	12.53	74.05	71.38	75.39	11.80	13.91	11.32	0.00	0.00	0.00	
Total	9,306	123,795	99.99	24,017	3.07	2.96	2.73	19.93	19.47	20.47	55.97	50.59	54.92	21.03	26.98	21.87	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Medford-Grants Pass, OR CSA (2017-2018)	1,451	19,580	15.59	5,810	87.85	72.78	48.12	3.96	15.78	8.18	11.44
99999 Medford-Grants Pass, OR CSA (2019)	1,221	16,778	13.12	N/A	89.42	72.24	N/A	3.37	18.92	7.21	8.85
Limited Review:											
99999 Bend-Prineville, OR CSA	2,536	33,989	27.25	5,972	90.77	76.06	47.92	3.27	12.46	5.96	11.47
21660 Eugene-Springfield, OR MSA	2,711	36,944	29.13	6,623	85.67	72.67	49.60	5.12	16.19	9.21	11.14
99999 OR Non-Metro Roll-up	1,387	16,504	14.90	5,612	86.22	69.79	51.35	3.78	17.16	10.00	13.05
Total	9,306	123,795	99.99	24,017	87.94	73.12	49.24	3.89	15.61	8.16	11.26

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Oregon																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
99999 Medford-Grants Pass, OR CSA (2017-2018)	74	851	19.84	174	1.25	0.00	1.72	9.26	4.05	7.47	65.21	71.62	68.97	24.28	24.32	21.84	0.00	0.00	0.00	
99999 Medford-Grants Pass, OR CSA (2019)	64	732	17.16	N/A	1.20	4.69	N/A	8.62	6.25	N/A	66.71	59.38	N/A	23.46	29.69	N/A	0.00	0.00	N/A	
Limited Review :																				
99999 Bend-Prineville, OR CSA	51	447	13.67	85	0.00	0.00	0.00	19.20	9.80	12.94	62.63	76.47	70.59	18.17	13.73	16.47	0.00	0.00	0.00	
21660 Eugene-Springfield, OR MSA	74	803	19.84	146	1.52	0.00	1.37	14.15	5.41	14.38	53.36	40.54	49.32	30.98	54.05	34.93	0.00	0.00	0.00	
99999 OR Non-Metro Roll-up	110	1,285	29.49	604	0.14	0.00	0.00	5.84	11.82	4.30	85.71	83.64	91.72	8.31	4.55	3.97	0.00	0.00	0.00	
Total	373	4,118	100.00	1,009	0.79	0.80	0.50	10.14	7.77	7.04	69.44	67.56	79.88	19.62	23.86	12.59	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Oregon												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review :													
99999 Medford-Grants Pass, OR CSA (2017-2018)	74	851	19.84	174.00	96.65	79.73	53.45	2.18	13.51	1.17	6.76		
99999 Medford-Grants Pass, OR CSA (2019)	64	732	17.16	0.00	96.77	70.31	N/A	1.78	26.56	1.46	3.13		
Limited Review :													
99999 Bend-Prineville, OR CSA	51	447	13.67	85.00	98.06	84.31	54.12	1.49	11.76	0.46	3.92		
21660 Eugene-Springfield, OR MSA	74	803	19.84	146.00	95.97	71.62	56.16	2.78	18.92	1.25	9.46		
99999 OR Non-Metro Roll-up	110	1,285	29.49	604.00	96.28	75.45	65.73	2.17	14.55	1.55	10.00		
Total	373	4,118	100.00	1,009	96.64	75.87	61.25	2.09	16.89	1.27	7.24		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Texas																			2017-2019																		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts																				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate																		
Full Review:																																					
12420 Austin-Round Rock-Georgetown, TX MSA	13,502	4,615,140	13.02	79,581	3.81	3.36	3.55	18.11	10.87	15.71	40.27	37.36	43.04	37.63	48.26	37.46	0.18	0.16	0.24																		
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	27,053	7,463,965	26.08	238,723	5.03	2.34	2.99	19.31	11.84	13.27	32.29	29.15	34.01	43.28	56.59	49.65	0.09	0.08	0.08																		
99999 Dallas-Fort Worth, TX-OK CSA (2019)	15,654	4,722,231	15.09	N/A	5.03	2.27	N/A	19.31	11.28	N/A	32.29	27.44	N/A	43.28	58.92	N/A	0.09	0.10	N/A																		
99999 Houston-The Woodlands, TX CSA	30,913	7,952,507	29.80	177,354	5.20	2.77	2.77	21.29	12.51	14.17	29.40	22.86	28.63	44.05	61.82	54.39	0.06	0.05	0.04																		
Limited Review:																																					
10180 Abilene, TX MSA	341	59,106	0.33	4,141	0.00	0.00	0.00	19.39	8.50	11.49	34.61	24.05	26.27	45.99	66.86	62.09	0.02	0.59	0.14																		
99999 Amarillo-Pampa-Borger, TX CSA	323	58,050	0.31	6,813	1.00	0.31	0.21	22.93	6.81	12.74	34.82	25.08	34.76	41.25	67.80	52.30	0.00	0.00	0.00																		
13140 Beaumont-Port Arthur, TX MSA	620	101,721	0.60	6,104	4.18	1.45	1.54	20.71	6.13	7.65	43.99	48.55	51.51	31.13	43.87	39.30	0.00	0.00	0.00																		
99999 Brownsville-Harlingen-Raymondville, TX CSA	377	62,301	0.36	5,046	0.00	0.00	0.00	29.12	11.14	12.94	29.94	21.49	26.81	40.94	67.37	60.25	0.00	0.00	0.00																		
17780 College Station-Bryan, TX MSA	869	178,167	0.84	4,939	2.26	4.60	4.11	27.55	17.38	22.35	23.56	25.43	25.57	46.63	52.59	47.92	0.00	0.00	0.04																		
99999 El Paso-Las Cruces, TX-NM (part) CSA	1,155	162,762	1.11	15,571	1.85	0.43	0.65	24.71	9.87	14.19	33.25	31.00	27.70	40.19	58.70	57.46	0.00	0.00	0.00																		
28660 Killeen-Temple, TX MSA	545	84,557	0.53	10,228	0.95	0.37	0.21	9.24	3.67	6.39	51.95	49.36	52.42	37.86	46.61	40.84	0.00	0.00	0.14																		
29700 Laredo, TX MSA	205	28,362	0.20	3,664	1.14	0.00	0.30	33.77	13.66	20.44	31.74	30.73	29.48	33.34	55.61	49.78	0.00	0.00	0.00																		
99999 Longview-Marshall, TX CSA	134	24,340	0.13	3,740	0.88	0.00	0.56	16.88	4.48	6.39	51.84	36.57	53.96	30.40	58.96	39.09	0.00	0.00	0.00																		
99999 Lubbock-Plainview-Levelland, TX CSA	861	161,846	0.83	9,507	2.52	1.16	1.67	16.40	5.46	9.67	38.15	36.12	41.29	42.94	57.26	47.38	0.00	0.00	0.00																		
99999 McAllen-Edinburg, TX CSA	702	105,249	0.68	9,422	1.37	0.14	0.31	24.63	8.26	13.32	42.25	32.62	37.94	31.51	58.83	48.28	0.24	0.14	0.15																		
99999 Midland-Odessa, TX CSA (2017-2018)	711	235,842	0.69	10,184	2.23	0.42	1.18	17.31	5.34	8.17	42.23	31.08	32.72	38.23	63.15	57.93	0.00	0.00	0.00																		
99999 Midland-Odessa, TX CSA (2019)	438	121,402	0.42	N/A	2.23	0.23	N/A	17.31	5.94	N/A	42.23	27.40	N/A	38.23	66.44	N/A	0.00	0.00	N/A																		
41700 San Antonio-New Braunfels, TX MSA	7,350	1,573,587	7.09	67,123	4.61	1.28	1.46	24.47	12.44	13.88	28.37	26.93	31.62	42.54	59.36	53.04	0.00	0.00	0.01																		
99999 Tyler-Jacksonville, TX CSA	454	84,587	0.44	5,296	0.90	0.00	0.59	19.89	10.13	13.67	40.88	39.43	39.56	38.33	50.44	46.19	0.00	0.00	0.00																		
47380 Waco, TX MSA	626	109,696	0.60	6,112	4.49	4.15	5.07	22.14	9.74	16.70	26.93	19.97	20.94	46.44	66.13	57.28	0.00	0.00	0.00																		
48660 Wichita Falls, TX MSA	183	22,701	0.18	3,161	6.05	2.19	1.11	23.71	13.66	16.58	26.63	24.04	27.93	43.62	60.11	54.38	0.00	0.00	0.00																		
99999 TX Non-Metro Roll-up (2017-2018)	450	83,800	0.43	5,089	0.00	0.00	0.00	4.12	2.89	5.93	49.30	47.78	64.75	46.57	49.33	29.32	0.00	0.00	0.00																		
99999 TX Non-Metro Roll-up (2019)	272	58,725	0.26	N/A	0.00	0.00	N/A	4.12	2.21	N/A	49.30	36.03	N/A	46.57	61.76	N/A	0.00	0.00	N/A																		
Total	103,738	28,070,644	100.02	671,798	4.33	2.40	2.53	20.22	11.56	13.64	33.19	28.26	33.91	42.19	57.71	49.85	0.07	0.07	0.07																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Texas																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
12420 Austin-Round Rock-Georgetown, TX MSA	13,502	4,615,140	13.01	79,581	22.52	3.04	3.77	16.90	12.19	15.32	19.76	21.15	21.86	40.82	59.07	44.79	0.00	4.55	14.26	
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	27,053	7,463,965	26.06	238,723	23.33	3.86	3.90	16.55	13.21	13.17	18.22	20.16	20.13	41.90	55.45	44.76	0.00	7.31	18.03	
99999 Dallas-Fort Worth, TX-OK CSA (2019)	15,654	4,722,231	15.08	N/A	23.33	4.29	N/A	16.55	14.28	N/A	18.22	20.22	N/A	41.90	56.59	N/A	0.00	4.61	N/A	
99999 Houston-The Woodlands, TX CSA	30,913	7,952,507	29.78	177,354	24.40	3.71	3.76	16.10	13.47	14.22	17.08	17.22	19.46	42.42	55.05	43.31	0.00	10.55	19.24	
Limited Review:																				
10180 Abilene, TX MSA	341	59,106	0.33	4,141	21.29	2.64	3.60	17.68	16.72	15.19	20.12	19.94	21.32	40.90	55.72	40.93	0.00	4.99	18.96	
99999 Amarillo-Pampa-Borger, TX CSA	323	58,050	0.31	6,813	22.04	4.02	5.92	17.04	17.65	16.00	19.66	21.36	19.10	41.27	45.82	34.74	0.00	11.15	24.25	
13140 Beaumont-Port Arthur, TX MSA	620	101,721	0.60	6,104	23.33	2.26	3.88	17.31	7.58	12.83	18.78	11.77	18.63	40.58	55.16	42.66	0.00	23.23	22.00	
99999 Brownsville-Harlingen-Raymondville, TX CSA	377	62,301	0.36	5,046	24.62	0.00	3.63	16.60	5.31	6.24	15.74	9.02	11.08	43.04	64.99	55.07	0.00	20.69	23.98	
17780 College Station-Bryan, TX MSA	869	178,167	0.84	4,939	24.54	2.65	3.02	15.82	11.51	13.30	16.87	20.60	18.38	42.77	59.84	47.99	0.00	5.41	17.31	
99999 El Paso-Las Cruces, TX-NM (part) CSA	1,155	162,762	1.11	15,571	22.30	2.94	4.02	17.41	7.45	12.41	19.12	16.19	23.40	41.17	51.52	41.17	0.00	21.90	19.00	
28660 Killeen-Temple, TX MSA	545	84,557	0.52	10,228	20.11	4.04	2.66	18.51	12.29	12.16	20.89	17.43	23.08	40.49	48.44	40.00	0.00	17.80	22.10	
29700 Laredo, TX MSA	205	28,362	0.20	3,664	25.56	1.46	2.27	15.38	3.90	6.71	16.78	8.29	18.18	42.28	49.76	45.50	0.00	36.59	27.35	
99999 Longview-Marshall, TX CSA	209	32,575	0.20	3,740	21.98	1.91	3.42	16.30	11.48	12.73	18.70	20.10	19.68	43.02	48.33	45.64	0.00	18.18	18.53	
99999 Lubbock-Plainview-Levelland, TX CSA	861	161,846	0.83	9,507	22.12	2.56	3.45	16.43	10.57	11.16	19.54	17.77	16.66	41.92	62.60	42.34	0.00	6.50	26.39	
99999 McAllen-Edinburg, TX CSA	702	105,249	0.68	9,422	25.12	0.43	3.68	16.30	4.27	4.39	15.41	11.97	11.49	43.17	67.95	55.72	0.00	15.38	24.71	
99999 Midland-Odessa, TX CSA (2017-2018)	711	235,842	0.68	10,184	21.76	4.36	6.17	17.41	13.64	18.20	20.37	21.52	24.70	40.47	53.59	33.18	0.00	6.89	17.76	
99999 Midland-Odessa, TX CSA (2019)	438	121,402	0.42	N/A	21.76	1.60	N/A	17.41	10.50	N/A	20.37	15.98	N/A	40.47	71.23	N/A	0.00	0.68	N/A	
41700 San Antonio-New Braunfels, TX MSA	7,350	1,573,587	7.08	67,123	22.82	4.10	3.35	17.36	12.69	12.33	19.21	21.14	21.47	40.60	51.62	41.53	0.00	10.45	21.32	
99999 Tyler-Jacksonville, TX CSA	454	84,587	0.44	5,296	21.93	2.86	4.61	17.68	16.52	14.50	18.66	22.03	20.34	41.72	52.86	43.98	0.00	5.73	16.58	
47380 Waco, TX MSA	626	109,696	0.60	6,112	22.52	3.83	3.44	17.72	12.94	11.47	17.96	19.17	18.80	41.80	57.51	47.20	0.00	6.55	19.09	
48660 Wichita Falls, TX MSA	183	22,701	0.18	3,161	22.50	4.92	6.26	16.54	15.30	14.36	20.77	22.95	19.99	40.19	42.62	35.62	0.00	14.21	23.76	
99999 TX Non-Metro Roll-up (2017-2018)	450	83,800	0.43	5,089	19.56	4.00	4.17	16.72	12.67	12.42	19.47	16.89	18.67	44.24	53.78	47.57	0.00	12.67	17.17	
99999 TX Non-Metro Roll-up (2019)	272	58,725	0.26	N/A	19.56	4.78	N/A	16.72	12.87	N/A	19.47	19.12	N/A	44.24	60.66	N/A	0.00	2.57	N/A	
Total	103,813	28,078,879	100.00	671,798	23.36	4.03	3.82	16.61	14.22	13.46	18.18	20.95	20.18	41.85	60.80	43.81	0.00	8.19	18.74	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Loans to Small Businesses By Income Category of the Geography - Texas																			2017-2019																		
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	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate																		
Full Review:																																					
12420 Austin-Round Rock- Georgetown, TX MSA	40,663	707,852	13.13	55,327	6.71	6.83	7.06	13.97	11.47	14.60	33.93	31.93	34.18	44.15	48.93	43.39	1.24	0.83	0.78																		
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	58,686	1,207,992	18.95	173,126	7.11	5.19	6.71	18.99	15.11	18.94	28.37	24.85	26.38	44.93	54.23	47.25	0.60	0.63	0.72																		
99999 Dallas-Fort Worth, TX-OK CSA (2019)	43,433	768,060	14.02	N/A	6.79	5.26	N/A	18.56	15.43	N/A	27.61	24.93	N/A	46.43	53.88	N/A	0.60	0.51	N/A																		
99999 Houston-The Woodlands, TX CSA	113,032	2,011,526	36.49	166,512	10.00	8.23	9.78	19.50	14.63	18.40	23.69	20.55	23.34	46.62	56.44	48.34	0.19	0.15	0.15																		
Limited Review:																																					
10180 Abilene, TX MSA	609	7,177	0.20	2,589	0.00	0.00	0.00	29.44	19.38	22.98	31.70	23.15	34.61	37.87	57.47	42.14	0.99	0.00	0.27																		
99999 Amarillo-Pampa-Borger, TX CSA	1,932	24,771	0.62	5,050	5.86	6.06	5.19	25.66	15.53	19.88	31.49	24.69	30.44	36.68	53.67	44.40	0.31	0.05	0.10																		
13140 Beaumont-Port Arthur, TX MSA	1,774	28,409	0.57	5,595	5.14	3.72	5.24	20.19	17.08	20.00	49.53	49.27	46.51	25.01	29.93	28.26	0.13	0.00	0.00																		
99999 Brownsville-Harlingen- Raymondville, TX CSA	1,892	31,150	0.61	5,802	0.00	0.00	0.00	32.48	23.20	29.64	27.70	26.48	30.14	39.53	50.00	39.90	0.29	0.32	0.31																		
17780 College Station-Bryan, TX MSA	2,017	29,132	0.65	3,735	7.43	6.35	4.55	28.71	19.19	26.35	26.45	25.83	26.32	36.99	48.64	42.76	0.42	0.00	0.03																		
99999 El Paso-Las Cruces, TX- NM (part) CSA	5,313	113,107	1.72	12,565	6.93	6.46	5.76	26.61	22.19	29.34	30.28	28.27	28.98	35.49	42.22	35.60	0.69	0.87	0.33																		
28660 Killeen-Temple, TX MSA	1,550	22,031	0.50	3,891	4.91	3.74	4.06	13.62	9.68	10.28	49.41	44.39	47.19	31.96	42.19	38.47	0.10	0.00	0.00																		
29700 Laredo, TX MSA	1,338	28,189	0.43	5,868	0.89	1.05	0.61	34.68	28.85	32.31	17.79	16.74	13.85	46.20	52.62	52.97	0.44	0.75	0.26																		
99999 Longview-Marshall, TX CSA	1,202	27,758	0.39	4,770	6.75	3.49	6.56	13.48	9.40	12.68	52.82	49.92	51.91	26.78	36.94	28.62	0.18	0.25	0.23																		
99999 Lubbock-Plainview- Levelland, TX CSA	2,774	34,192	0.90	5,868	3.78	2.38	2.74	17.13	10.38	15.08	36.28	32.52	34.37	42.73	54.58	47.77	0.09	0.14	0.03																		
99999 McAllen-Edinburg, TX CSA	4,235	94,742	1.37	11,401	0.47	0.31	0.46	19.07	15.44	18.77	34.44	29.78	35.35	45.82	54.36	45.23	0.20	0.12	0.19																		
99999 Midland-Odessa, TX CSA (2017-2018)	2,172	31,610	0.70	3,376	1.46	0.92	1.16	23.19	15.79	20.88	35.83	34.07	35.93	39.04	49.17	42.03	0.47	0.05	0.00																		
99999 Midland-Odessa, TX CSA (2019)	1,723	24,189	0.56	N/A	1.49	1.04	N/A	22.44	17.59	N/A	35.33	33.89	N/A	40.33	47.36	N/A	0.40	0.12	N/A																		
41700 San Antonio-New Braunfels, TX MSA	19,523	297,630	6.30	35,279	4.58	3.03	4.23	21.12	14.95	20.27	28.68	25.03	28.39	45.37	56.81	46.86	0.24	0.18	0.24																		
99999 Tyler-Jacksonville, TX CSA	1,503	24,062	0.49	5,342	6.13	3.66	7.26	17.89	14.24	18.23	35.04	32.14	32.83	40.76	49.77	41.37	0.17	0.20	0.30																		
47380 Waco, TX MSA	1,672	28,593	0.54	3,363	5.08	5.62	4.37	30.44	27.27	27.98	25.27	25.96	27.89	38.64	40.73	39.34	0.56	0.42	0.42																		
48660 Wichita Falls, TX MSA	677	20,678	0.22	1,390	4.89	4.87	4.89	33.57	31.61	32.66	17.33	15.51	14.03	44.07	47.71	48.27	0.14	0.30	0.14																		
99999 TX Non-Metro Roll-up (2017-2018)	1,131	16,270	0.37	4,231	0.00	0.00	0.00	8.63	4.60	4.89	55.31	44.74	41.74	36.06	50.66	53.37	0.00	0.00	0.00																		
99999 TX Non-Metro Roll-up (2019)	888	11,525	0.29	N/A	0.00	0.00	N/A	6.65	3.49	N/A	40.89	37.16	N/A	52.46	59.35	N/A	0.00	0.00	N/A																		
Total	309,739	5,590,645	100.02	515,080	6.85	6.16	7.01	19.11	14.73	18.83	28.78	24.98	27.55	44.74	53.74	46.19	0.51	0.39	0.42																		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Texas 2017-2019											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
12420 Austin-Round Rock-Georgetown, TX MSA	40,663	707,852	13.13	55,327	88.14	72.13	42.80	3.75	15.78	8.12	12.09
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	58,686	1,207,992	18.95	173,126	85.75	69.86	42.20	5.06	16.88	9.19	13.27
99999 Dallas-Fort Worth, TX-OK CSA (2019)	43,433	768,060	14.02	N/A	87.44	73.05	N/A	4.26	18.81	8.30	8.14
99999 Houston-The Woodlands, TX CSA	113,032	2,011,526	36.49	166,512	85.24	70.55	40.67	5.92	18.52	8.84	10.93
Limited Review:											
10180 Abilene, TX MSA	609	7,177	0.20	2,589	80.02	70.61	34.76	5.87	18.72	14.10	10.67
99999 Amarillo-Pampa-Borger, TX CSA	1,932	24,771	0.62	5,050	82.09	62.94	45.76	5.48	24.95	12.42	12.11
13140 Beaumont-Port Arthur, TX MSA	1,774	28,409	0.57	5,595	80.79	63.19	34.83	5.43	24.30	13.78	12.51
99999 Brownsville-Harlingen-Raymondville, TX CSA	1,892	31,150	0.61	5,802	81.61	64.85	40.38	5.03	23.89	13.36	11.26
17780 College Station-Bryan, TX MSA	2,017	29,132	0.65	3,735	79.95	72.48	39.12	5.24	15.72	14.82	11.80
99999 El Paso-Las Cruces, TX-NM (part) CSA	5,313	113,107	1.72	12,565	84.15	65.07	43.29	4.55	25.56	11.31	9.37
28660 Killeen-Temple, TX MSA	1,550	22,031	0.50	3,891	85.57	72.65	40.58	3.19	18.13	11.24	9.23
29700 Laredo, TX MSA	1,338	28,189	0.43	5,868	81.10	60.54	42.33	7.00	27.28	11.90	12.18
99999 Longview-Marshall, TX CSA	1,202	27,758	0.39	4,770	79.51	67.22	42.39	6.03	21.96	14.46	10.82
99999 Lubbock-Plainview-Levelland, TX CSA	2,774	34,192	0.90	5,868	83.88	64.46	38.84	4.94	22.57	11.19	12.98
99999 McAllen-Edinburg, TX CSA	4,235	94,742	1.37	11,401	84.73	66.07	38.03	4.36	24.13	10.92	9.80
99999 Midland-Odessa, TX CSA (2017-2018)	2,172	31,610	0.70	3,376	79.65	61.14	24.26	7.36	25.46	12.99	13.40
99999 Midland-Odessa, TX CSA (2019)	1,723	24,189	0.56	N/A	82.13	63.20	N/A	6.26	26.87	11.61	9.92
41700 San Antonio-New Braunfels, TX MSA	19,523	297,630	6.30	35,279	86.24	68.68	42.73	4.20	21.50	9.56	9.81
99999 Tyler-Jacksonville, TX CSA	1,503	24,062	0.49	5,342	84.86	67.00	40.85	4.72	20.09	10.42	12.91
47380 Waco, TX MSA	1,672	28,593	0.54	3,363	83.22	65.55	37.64	5.19	21.71	11.59	12.74
48660 Wichita Falls, TX MSA	677	20,678	0.22	1,390	79.25	63.96	41.15	6.26	24.67	14.49	11.37
99999 TX Non-Metro Roll-up (2017-2018)	1,131	16,270	0.37	4,231	84.23	69.23	45.14	4.80	15.47	10.97	15.30
99999 TX Non-Metro Roll-up (2019)	888	11,525	0.29	N/A	85.62	72.30	N/A	4.25	17.23	10.13	10.47
Total	309,739	5,590,645	100.02	515,080	85.94	70.33	41.43	4.85	18.57	9.21	11.11

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Texas																			2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate		
Full Review:																					
12420 Austin-Round Rock-Georgetown, TX MSA	331	3,030	12.04	422	4.72	4.23	2.84	17.84	15.11	23.93	40.19	38.07	45.97	36.99	41.69	27.01	0.25	0.91	0.24		
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	465	5,659	16.91	1,495	4.87	0.00	1.00	16.27	8.39	13.44	34.55	35.27	45.89	43.93	56.34	39.67	0.36	0.00	0.00		
99999 Dallas-Fort Worth, TX-OK CSA (2019)	306	3,927	11.13	N/A	4.69	0.33	N/A	16.49	9.48	N/A	33.48	39.54	N/A	44.96	50.65	N/A	0.39	0.00	N/A		
99999 Houston-The Woodlands, TX CSA	756	8,995	27.49	921	5.31	2.38	1.41	17.62	10.85	17.92	32.69	31.22	41.91	44.31	55.56	38.76	0.06	0.00	0.00		
Limited Review:																					
10180 Abilene, TX MSA	6	111	0.22	143	0.00	0.00	0.00	12.46	16.67	3.50	30.09	16.67	55.94	57.45	66.67	40.56	0.00	0.00	0.00		
99999 Amarillo-Pampa-Borger, TX CSA	82	1,181	2.98	365	3.39	0.00	0.55	11.71	8.54	4.93	31.88	30.49	21.10	53.03	60.98	73.42	0.00	0.00	0.00		
13140 Beaumont-Port Arthur, TX MSA	23	150	0.84	67	3.24	0.00	0.00	13.52	8.70	2.99	43.81	21.74	35.82	39.43	69.57	61.19	0.00	0.00	0.00		
99999 Brownsville-Harlingen-Raymondville, TX CSA	39	371	1.42	108	0.00	0.00	0.00	20.80	12.82	22.22	33.57	17.95	33.33	45.63	69.23	44.44	0.00	0.00	0.00		
17780 College Station-Bryan, TX MSA	32	296	1.16	90	2.88	6.25	1.11	22.36	9.38	20.00	26.68	21.88	30.00	47.84	62.50	48.89	0.24	0.00	0.00		
99999 El Paso-Las Cruces, TX-NM (part) CSA	20	247	0.73	34	2.91	5.00	0.00	29.06	30.00	41.18	28.03	10.00	8.82	39.83	55.00	50.00	0.17	0.00	0.00		
28660 Killeen-Temple, TX MSA	28	315	1.02	149	2.95	0.00	0.00	6.84	3.57	1.34	48.06	32.14	31.54	42.15	64.29	67.11	0.00	0.00	0.00		
29700 Laredo, TX MSA	9	118	0.33	53	0.54	0.00	0.00	34.41	55.56	66.04	22.58	33.33	3.77	42.47	11.11	30.19	0.00	0.00	0.00		
99999 Longview-Marshall, TX CSA	24	251	0.87	73	1.59	0.00	2.74	10.19	0.00	9.59	61.46	54.17	60.27	26.75	45.83	27.40	0.00	0.00	0.00		
99999 Lubbock-Plainview - Levelland, TX CSA	160	1,551	5.82	437	1.69	1.25	0.69	8.35	3.13	2.97	34.52	22.50	35.93	55.44	73.13	60.41	0.00	0.00	0.00		
99999 McAllen-Edinburg, TX CSA	73	665	2.65	132	0.90	8.22	2.27	19.31	15.07	19.70	38.77	23.29	32.58	40.12	53.42	44.70	0.90	0.00	0.76		
99999 Midland-Odessa, TX CSA (2017-2018)	24	214	0.87	9	1.10	0.00	0.00	13.44	16.67	11.11	34.36	20.83	11.11	50.88	62.50	77.78	0.22	0.00	0.00		
99999 Midland-Odessa, TX CSA (2019)	17	163	0.62	N/A	0.97	0.00	N/A	14.67	5.88	N/A	32.24	11.76	N/A	51.93	82.35	N/A	0.19	0.00	N/A		
41700 San Antonio-New Braunfels, TX MSA	163	2,847	5.93	188	2.21	3.68	1.06	15.31	4.29	10.11	29.55	22.70	35.64	52.87	69.33	53.19	0.06	0.00	0.00		
99999 Tyler-Jacksonville, TX CSA	32	338	1.16	197	1.69	0.00	1.52	16.86	12.50	10.66	42.66	50.00	61.93	38.79	37.50	25.89	0.00	0.00	0.00		
47380 Waco, TX MSA	32	247	1.16	109	2.16	0.00	0.92	14.04	6.25	3.67	37.81	46.88	55.05	45.99	46.88	40.37	0.00	0.00	0.00		
48660 Wichita Falls, TX MSA	9	79	0.33	28	4.31	0.00	3.57	23.71	11.11	7.14	12.93	66.67	17.86	59.05	22.22	71.43	0.00	0.00	0.00		
99999 TX Non-Metro Roll-up (2017-2018)	64	589	2.33	443	0.00	0.00	0.00	4.02	0.00	2.48	53.24	48.44	55.98	42.75	51.56	41.53	0.00	0.00	0.00		
99999 TX Non-Metro Roll-up (2019)	55	539	2.00	N/A	0.00	0.00	N/A	2.88	3.64	N/A	45.62	27.27	N/A	51.50	69.09	N/A	0.00	0.00	N/A		
Total	2,750	31,883	100.01	5,463	4.04	1.82	1.06	16.01	9.71	12.61	34.93	32.69	42.27	44.79	55.67	44.02	0.24	0.11	0.04		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Texas 2017-2019											
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
12420 Austin-Round Rock-Georgetown, TX MSA	331	3,030	12.04	422.00	96.61	74.62	41.23	1.89	7.25	1.50	18.13
99999 Dallas-Fort Worth, TX-OK CSA (2017-2018)	465	5,659	16.91	1,495.00	95.26	76.99	49.50	2.48	8.39	2.26	14.62
99999 Dallas-Fort Worth, TX-OK CSA (2019)	306	3,927	11.13	0.00	95.88	73.86	N/A	2.17	12.42	1.95	13.73
99999 Houston-The Woodlands, TX CSA	756	8,995	27.49	921.00	95.00	75.53	51.90	2.76	12.17	2.24	12.30
Limited Review:											
10180 Abilene, TX MSA	6	111	0.22	143.00	97.26	66.67	67.83	2.74	33.33	0.00	0.00
99999 Amarillo-Pampa-Borger, TX CSA	82	1,181	2.98	365.00	94.64	74.39	67.95	3.81	10.98	1.55	14.63
13140 Beaumont-Port Arthur, TX MSA	23	150	0.84	67.00	99.05	65.22	65.67	0.76	13.04	0.19	21.74
99999 Brownsville-Harlingen-Raymondville, TX CSA	39	371	1.42	108.00	95.98	69.23	32.41	2.36	20.51	1.65	10.26
17780 College Station-Bryan, TX MSA	32	296	1.16	90.00	93.51	87.50	58.89	2.16	6.25	4.33	6.25
99999 El Paso-Las Cruces, TX-NM (part) CSA	20	247	0.73	34.00	92.99	60.00	29.41	4.44	30.00	2.56	10.00
28660 Killeen-Temple, TX MSA	28	315	1.02	149.00	97.36	71.43	44.97	1.09	0.00	1.56	28.57
29700 Laredo, TX MSA	9	118	0.33	53.00	95.16	66.67	88.68	2.69	11.11	2.15	22.22
99999 Longview-Marshall, TX CSA	24	251	0.87	73.00	96.82	75.00	64.38	2.23	4.17	0.96	20.83
99999 Lubbock-Plainview - Levelland, TX CSA	160	1,551	5.82	437.00	96.44	80.00	49.20	2.35	8.75	1.22	11.25
99999 McAllen-Edinburg, TX CSA	73	665	2.65	132.00	90.87	73.97	35.61	6.44	21.92	2.69	4.11
99999 Midland-Odessa, TX CSA (2017-2018)	24	214	0.87	9.00	98.24	75.00	11.11	0.66	4.17	1.10	20.83
99999 Midland-Odessa, TX CSA (2019)	17	163	0.62	0.00	98.26	76.47	N/A	0.58	5.88	1.16	17.65
41700 San Antonio-New Braunfels, TX MSA	163	2,847	5.93	188.00	95.91	74.85	53.19	2.06	5.52	2.03	19.63
99999 Tyler-Jacksonville, TX CSA	32	338	1.16	197.00	95.95	87.50	71.07	2.19	0.00	1.85	12.50
47380 Waco, TX MSA	32	247	1.16	109.00	97.38	81.25	42.20	1.39	3.13	1.23	15.63
48660 Wichita Falls, TX MSA	9	79	0.33	28.00	94.83	44.44	28.57	1.72	0.00	3.45	55.56
99999 TX Non-Metro Roll-up (2017-2018)	64	589	2.33	443.00	95.98	78.12	58.01	2.01	7.81	2.01	14.06
99999 TX Non-Metro Roll-up (2019)	55	539	2.00	0.00	96.15	70.91	N/A	1.92	16.36	1.92	12.73
Total	2,750	31,883	100.01	5,463	95.68	75.45	52.24	2.34	10.22	1.98	14.33

Source: 2015 ACS: 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Salt Lake City-Provo-Orem, UT CSA	11,435	3,204,631	85.10	118,806	1.29	1.33	1.28	15.71	14.40	14.58	48.49	49.08	52.22	34.26	34.81	31.69	0.25	0.38	0.23	
Limited Review:																				
30860 Logan, UT-ID MSA	328	69,361	2.44	4,753	1.50	1.52	1.81	12.65	15.55	13.40	47.27	42.68	46.08	38.58	40.24	38.71	0.00	0.00	0.00	
41100 St. George, UT MSA	866	228,979	6.44	9,872	0.00	0.00	0.00	5.50	3.46	4.62	82.07	86.03	83.96	12.43	10.51	11.42	0.00	0.00	0.00	
99999 UT Non-Metro Roll-up (2017-2018)	507	341,816	3.77	4,460	0.00	0.00	0.00	0.00	0.00	0.00	32.29	17.36	28.79	67.40	82.45	70.34	0.31	0.20	0.87	
99999 UT Non-Metro Roll-up (2019)	301	225,469	2.24	N/A	0.00	0.00	N/A	0.00	0.00	N/A	32.29	18.60	N/A	67.40	80.40	N/A	0.31	1.00	N/A	
Total	13,437	4,070,256	99.99	137,891	1.15	1.17	1.16	14.08	12.86	13.36	49.50	49.42	53.52	35.05	36.20	31.73	0.23	0.35	0.23	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Salt Lake City-Provo-Orem, UT CSA	11,435	3,204,631	85.10	118,806	19.02	6.23	5.84	18.09	23.44	21.26	22.74	26.24	26.83	40.15	40.83	33.54	0.00	3.27	12.54	
Limited Review:																				
30860 Logan, UT-ID MSA	328	69,361	2.44	4,753	19.40	3.66	4.23	18.53	17.38	18.26	22.53	24.39	26.19	39.54	42.99	36.12	0.00	11.59	15.19	
41100 St. George, UT MSA	866	228,979	6.44	9,872	17.73	4.62	4.11	19.64	15.36	14.19	23.28	23.21	23.01	39.35	55.08	43.16	0.00	1.73	15.52	
99999 UT Non-Metro Roll-up (2017-2018)	507	341,816	3.77	4,460	12.14	1.38	1.70	11.89	5.13	6.91	17.66	9.07	13.52	58.31	78.90	68.09	0.00	5.52	9.78	
99999 UT Non-Metro Roll-up (2019)	301	225,469	2.24	N/A	12.14	0.66	N/A	11.89	3.65	N/A	17.66	7.64	N/A	58.31	81.06	N/A	0.00	6.98	N/A	
Total	13,437	4,070,256	99.99	137,891	18.59	5.96	5.52	17.87	22.43	20.18	22.49	25.85	26.10	41.05	45.76	35.44	0.00	3.54	12.75	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Utah																			2017-2019	
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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
99999 Salt Lake City-Provo-Orem, UT CSA	25,876	531,000	84.65	49,695	3.90	3.78	3.75	17.79	14.74	17.93	42.51	41.11	43.05	35.31	39.94	34.78	0.48	0.43	0.49	
Limited Review:																				
30860 Logan, UT-ID MSA	1,147	19,103	3.75	2,126	6.80	4.88	4.80	21.55	15.26	19.33	39.21	38.10	41.49	32.44	41.76	34.38	0.00	0.00	0.00	
41100 St. George, UT MSA	2,012	26,338	6.58	4,285	0.00	0.00	0.00	7.03	7.01	4.97	81.87	79.92	84.08	11.10	13.07	10.95	0.00	0.00	0.00	
99999 UT Non-Metro Roll-up (2017-2018)	872	18,290	2.85	3,115	0.00	0.00	0.00	0.00	0.00	0.00	25.43	20.18	27.45	74.53	79.82	72.49	0.04	0.00	0.06	
99999 UT Non-Metro Roll-up (2019)	661	14,002	2.16	N/A	0.00	0.00	N/A	0.00	0.00	N/A	25.00	22.39	N/A	74.95	77.61	N/A	0.05	0.00	N/A	
Total	30,568	608,733	99.99	59,221	3.45	3.39	3.32	15.84	13.51	16.10	43.15	42.55	45.14	37.15	40.20	35.02	0.40	0.36	0.42	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Utah												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Salt Lake City-Provo-Orem, UT CSA	25,876	531,000	84.65	49,695	88.16	71.32	43.67	4.13	17.82	7.71	10.86		
Limited Review:													
30860 Logan, UT-ID MSA	1,147	19,103	3.75	2,126	84.76	70.62	44.31	4.46	18.74	10.78	10.64		
41100 St. George, UT MSA	2,012	26,338	6.58	4,285	87.89	73.51	46.95	3.58	17.10	8.53	9.39		
99999 UT Non-Metro Roll-up (2017-2018)	872	18,290	2.85	3,115	89.34	72.94	49.34	3.79	13.76	6.87	13.30		
99999 UT Non-Metro Roll-up (2019)	661	14,002	2.16	N/A	90.52	72.47	N/A	3.26	19.21	6.22	8.32		
Total	30,568	608,733	99.99	59,221	88.18	71.51	44.23	4.06	17.72	7.75	10.77		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Utah																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
99999 Salt Lake City-Provo-Orem, UT CSA	153	2,213	65.38	180	2.24	0.00	0.00	14.89	7.19	10.56	47.12	51.63	51.67	35.53	41.18	37.78	0.21	0.00	0.00	
Limited Review :																				
30860 Logan, UT-ID MSA	43	460	18.38	120	1.04	2.33	0.83	7.29	11.63	4.17	61.72	72.09	85.00	29.95	13.95	10.00	0.00	0.00	0.00	
41100 St. George, UT MSA	17	166	7.26	24	0.00	0.00	0.00	8.92	5.88	0.00	77.84	88.24	95.83	13.24	5.88	4.17	0.00	0.00	0.00	
99999 UT Non-Metro Roll-up (2017-2018)	12	111	5.13	39	0.00	0.00	0.00	0.00	0.00	0.00	43.44	50.00	56.41	56.56	50.00	43.59	0.00	0.00	0.00	
99999 UT Non-Metro Roll-up (2019)	9	83	3.85	N/A	0.00	0.00	N/A	0.00	0.00	N/A	40.95	33.33	N/A	59.05	66.67	N/A	0.00	0.00	N/A	
Total	234	3,033	100.00	363	1.70	0.43	0.28	11.97	7.26	6.61	49.72	57.26	66.12	36.45	35.04	27.00	0.15	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Utah												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review :													
99999 Salt Lake City-Provo-Orem, UT CSA	153	2,213	65.38	180.00	96.17	73.86	46.67	2.27	13.07	1.56	13.07		
Limited Review :													
30860 Logan, UT-ID MSA	43	460	18.38	120.00	96.61	55.81	28.33	2.60	32.56	0.78	11.63		
41100 St. George, UT MSA	17	166	7.26	24.00	97.57	82.35	54.17	1.35	11.76	1.08	5.88		
99999 UT Non-Metro Roll-up (2017-2018)	12	111	5.13	39.00	97.81	75.00	43.59	1.25	8.33	0.94	16.67		
99999 UT Non-Metro Roll-up (2019)	9	83	3.85	0.00	98.05	88.89	N/A	1.11	11.11	0.84	0.00		
Total	234	3,033	100.00	363	96.53	71.79	40.77	2.09	16.24	1.38	11.97		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Washington 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Seattle-Tacoma, WA CSA (2017-2018)	15,861	7,601,349	53.58	196,903	2.18	2.22	2.35	16.67	15.25	18.12	48.54	40.84	49.06	32.60	41.66	30.46	0.01	0.03	0.01	
99999 Seattle-Tacoma, WA CSA (2019)	8,654	4,461,208	29.23	N/A	2.18	2.20	N/A	16.67	17.23	N/A	48.54	42.20	N/A	32.60	38.36	N/A	0.01	0.01	N/A	
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID (part) CSA	1,656	334,010	5.59	22,743	0.06	0.06	0.14	20.73	18.06	23.51	47.50	42.45	42.93	31.39	39.07	33.03	0.32	0.36	0.39	
Limited Review:																				
13380 Bellingham, WA MSA	789	280,952	2.67	6,970	1.03	2.03	1.35	4.15	3.93	4.40	77.79	77.69	80.75	16.97	16.22	13.39	0.06	0.13	0.11	
99999 Kennewick-Richland-Walla Walla, WA CSA (2017-2018)	593	116,314	2.00	12,495	1.70	1.18	1.62	22.11	18.38	19.92	40.70	33.39	39.49	35.49	47.05	38.93	0.01	0.00	0.04	
99999 Kennewick-Richland-Walla Walla, WA CSA (2019)	318	73,604	1.07	N/A	1.70	2.52	N/A	22.11	18.55	N/A	40.70	39.62	N/A	35.49	39.31	N/A	0.01	0.00	N/A	
48300 Wenatchee, WA MSA	421	132,356	1.42	3,965	0.00	0.00	0.00	12.30	10.45	12.59	78.42	78.86	78.69	9.28	10.69	8.73	0.00	0.00	0.00	
49420 Yakima, WA MSA	404	69,652	1.36	5,313	0.00	0.00	0.00	17.58	13.37	12.12	41.17	39.85	39.86	41.26	46.78	48.01	0.00	0.00	0.00	
99999 WA Non-Metro Roll-up	908	220,851	3.07	12,304	0.45	1.21	0.77	11.23	4.96	8.91	71.79	77.64	73.89	16.52	16.19	16.42	0.00	0.00	0.01	
Total	29,604	13,290,296	99.99	260,693	1.89	1.98	1.93	16.72	15.37	17.67	49.63	43.80	50.35	31.73	38.81	30.00	0.02	0.04	0.05	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data. 'N/A' 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 - Washington 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Seattle-Tacoma, WA CSA (2017-2018)	15,861	7,601,349	53.58	196,903	20.80	4.03	4.44	17.70	13.06	15.30	21.09	18.30	24.83	40.41	57.37	43.57	0.00	7.24	11.86	
99999 Seattle-Tacoma, WA CSA (2019)	8,654	4,461,208	29.23	N/A	20.80	4.89	N/A	17.70	17.77	N/A	21.09	19.85	N/A	40.41	52.63	N/A	0.00	4.85	N/A	
99999 Spokane-Spokane Valley-Coeur d'Alene, WA-ID (part) CSA	1,656	334,010	5.59	22,743	20.68	4.59	4.67	17.15	18.12	16.55	22.07	23.19	22.95	40.10	47.22	41.01	0.00	6.88	14.82	
Limited Review:																				
13380 Bellingham, WA MSA	789	280,952	2.67	6,970	20.76	2.28	4.63	17.12	15.21	15.72	22.48	18.76	25.80	39.64	57.79	44.25	0.00	5.96	9.60	
99999 Kennewick-Richland-Walla Walla, WA CSA (2017-2018)	593	116,314	2.00	12,495	21.65	3.37	5.91	17.21	16.69	18.18	19.93	21.92	24.75	41.21	46.88	38.22	0.00	11.13	12.93	
99999 Kennewick-Richland-Walla Walla, WA CSA (2019)	318	73,604	1.07	N/A	21.65	5.66	N/A	17.21	26.73	N/A	19.93	24.84	N/A	41.21	39.94	N/A	0.00	2.83	N/A	
48300 Wenatchee, WA MSA	421	132,356	1.42	3,965	19.06	2.61	3.03	19.11	9.98	11.58	22.27	19.95	23.25	39.56	63.42	51.75	0.00	4.04	10.39	
49420 Yakima, WA MSA	404	69,652	1.36	5,313	20.21	5.20	3.37	18.12	15.10	12.54	20.58	20.05	22.40	41.09	48.02	47.90	0.00	11.63	13.80	
99999 WA Non-Metro Roll-up	908	220,851	3.07	12,304	20.05	4.07	5.19	18.87	11.89	14.45	22.02	20.93	23.68	39.05	55.07	44.59	0.00	8.04	12.09	
Total	29,604	13,290,296	99.99	260,693	20.78	4.57	4.53	17.70	16.00	15.40	21.13	20.67	24.56	40.39	58.77	43.37	0.00	6.56	12.14	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Washington 2017-2019

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	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	% of Busines- ses	% Bank Loans	% Aggregate	
Full Review:																				
99999 Seattle-Tacoma, WA CSA (2017-2018)	25,957	439,355	47.60	101,137	5.12	3.40	5.00	19.33	15.78	17.89	41.38	39.76	41.48	33.83	40.81	35.25	0.34	0.25	0.38	
99999 Seattle-Tacoma, WA CSA (2019)	18,832	299,761	34.53	N/A	5.08	3.55	N/A	19.21	16.46	N/A	41.47	40.11	N/A	33.91	39.62	N/A	0.34	0.25	N/A	
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID (part) CSA	3,747	59,688	6.87	8,699	2.92	1.97	2.30	32.27	26.31	30.07	39.82	36.72	39.57	24.14	34.40	27.35	0.85	0.59	0.71	
Limited Review:																				
13380 Bellingham, WA MSA	1,655	24,480	3.03	4,617	1.70	2.24	1.67	5.38	4.89	6.50	72.46	71.06	74.18	14.85	16.98	12.87	5.62	4.83	4.79	
99999 Kennewick-Richland-Walla Walla, WA CSA (2017- 2018)	832	16,715	1.53	4,683	2.25	2.40	2.41	26.81	16.35	26.44	42.54	42.19	40.38	28.00	38.58	30.34	0.40	0.48	0.43	
99999 Kennewick-Richland-Walla Walla, WA CSA (2019)	659	8,946	1.21	N/A	2.19	1.82	N/A	26.11	21.70	N/A	42.55	40.36	N/A	28.79	35.36	N/A	0.36	0.76	N/A	
48300 Wenatchee, WA MSA	486	6,390	0.89	2,179	0.00	0.00	0.00	20.07	17.49	18.45	71.31	71.81	73.34	8.62	10.70	8.21	0.00	0.00	0.00	
49420 Yakima, WA MSA	706	11,217	1.29	3,006	0.00	0.00	0.00	29.21	20.82	24.88	39.37	38.67	42.91	31.43	40.51	32.20	0.00	0.00	0.00	
99999 WA Non-Metro Roll-up	1,663	22,474	3.05	5,660	1.09	0.72	0.71	17.13	12.21	13.66	69.38	69.99	70.09	12.36	17.08	15.55	0.04	0.00	0.00	
Total	54,537	889,026	100.00	129,981	4.56	3.13	4.22	19.94	16.46	18.60	43.14	41.86	44.28	31.88	38.14	32.37	0.47	0.41	0.53	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Washington											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
99999 Seattle-Tacoma, WA CSA (2017-2018)	25,957	439,355	47.60	101,137	85.88	70.22	45.37	4.97	13.22	9.15	16.57	
99999 Seattle-Tacoma, WA CSA (2019)	18,832	299,761	34.53	N/A	87.05	73.84	N/A	4.49	15.09	8.46	11.07	
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID (part) CSA	3,747	59,688	6.87	8,699	84.90	70.64	47.13	4.91	16.47	10.19	12.89	
Limited Review:												
13380 Bellingham, WA MSA	1,655	24,480	3.03	4,617	87.86	74.26	43.88	4.69	14.50	7.45	11.24	
99999 Kennewick-Richland-Walla Walla, WA CSA (2017- 2018)	832	16,715	1.53	4,683	82.88	71.88	45.95	4.91	15.99	12.21	12.14	
99999 Kennewick-Richland-Walla Walla, WA CSA (2019)	659	8,946	1.21	N/A	84.41	72.23	N/A	4.43	21.24	11.16	6.53	
48300 Wenatchee, WA MSA	486	6,390	0.89	2,179	82.64	70.37	47.73	5.16	13.99	12.20	15.64	
49420 Yakima, WA MSA	706	11,217	1.29	3,006	79.88	67.99	49.80	6.36	18.27	13.76	13.74	
99999 WA Non-Metro Roll-up	1,663	22,474	3.05	5,660	83.16	72.70	51.57	4.40	11.12	12.45	16.18	
Total	54,537	889,026	100.00	129,981	86.11	71.72	45.87	4.74	14.27	9.15	14.01	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - Washington																			2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate		
Full Review :																					
99999 Seattle-Tacoma, WA CSA (2017-2018)	185	2,328	23.07	603	2.83	0.00	0.66	16.07	7.57	11.11	48.89	56.22	55.22	32.16	36.22	33.00	0.05	0.00	0.00		
99999 Seattle-Tacoma, WA CSA (2019)	125	1,207	15.59	N/A	2.88	0.80	N/A	16.39	12.80	N/A	49.15	47.20	N/A	31.51	39.20	N/A	0.06	0.00	N/A		
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID (part) CSA	93	813	11.60	207	0.61	0.00	0.00	18.68	21.51	20.29	49.30	33.33	48.31	31.41	45.16	31.40	0.00	0.00	0.00		
Limited Review :																					
13380 Bellingham, WA MSA	61	689	7.61	183	1.31	0.00	0.00	2.11	1.64	2.19	82.07	68.85	73.22	14.40	29.51	24.59	0.10	0.00	0.00		
99999 Kennewick-Richland- Walla Walla, WA CSA (2017-2018)	44	512	5.49	341	1.32	2.27	0.00	20.01	9.09	19.94	60.87	47.73	60.41	17.59	40.91	19.35	0.21	0.00	0.29		
99999 Kennewick-Richland- Walla Walla, WA CSA (2019)	46	633	5.74	N/A	1.45	0.00	N/A	19.46	21.74	N/A	60.62	65.22	N/A	18.27	13.04	N/A	0.20	0.00	N/A		
48300 Wenatchee, WA MSA	28	285	3.49	148	0.00	0.00	0.00	14.32	7.14	14.19	77.24	92.86	83.78	8.44	0.00	2.03	0.00	0.00	0.00		
49420 Yakima, WA MSA	66	761	8.23	308	0.00	0.00	0.00	7.59	4.55	4.22	57.07	56.06	62.99	35.34	39.39	32.79	0.00	0.00	0.00		
99999 WA Non-Metro Roll-up	154	1,624	19.20	759	0.33	0.00	0.00	14.99	7.79	14.76	70.23	77.92	68.77	14.45	14.29	16.47	0.00	0.00	0.00		
Total	802	8,852	100.02	2,549	2.07	0.25	0.16	15.72	10.22	12.83	54.61	58.60	63.28	27.54	30.92	23.70	0.06	0.00	0.04		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Washington 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Seattle-Tacoma, WA CSA (2017-2018)	185	2,328	23.07	603.00	95.25	75.68	46.93	2.82	6.49	1.93	17.84
99999 Seattle-Tacoma, WA CSA (2019)	125	1,207	15.59	0.00	95.70	70.40	N/A	2.47	5.60	1.83	24.00
99999 Spokane-Spokane Valley- Coeur d'Alene, WA-ID (part) CSA	93	813	11.60	207.00	96.33	81.72	51.21	2.08	5.38	1.59	12.90
Limited Review:											
13380 Bellingham, WA MSA	61	689	7.61	183.00	96.17	73.77	33.88	2.11	11.48	1.71	14.75
99999 Kennewick-Richland- Walla Walla, WA CSA (2017-2018)	44	512	5.49	341.00	92.31	63.64	39.00	5.19	20.45	2.49	15.91
99999 Kennewick-Richland- Walla Walla, WA CSA (2019)	46	633	5.74	0.00	92.74	71.74	N/A	4.82	17.39	2.44	10.87
48300 Wenatchee, WA MSA	28	285	3.49	148.00	93.73	89.29	60.81	4.09	3.57	2.17	7.14
49420 Yakima, WA MSA	66	761	8.23	308.00	87.35	62.12	44.81	9.77	25.76	2.88	12.12
99999 WA Non-Metro Roll-up	154	1,624	19.20	759.00	95.06	75.32	55.07	2.78	14.29	2.16	10.39
Total	802	8,852	100.02	2,549	94.81	73.82	48.25	3.20	10.97	1.99	15.21

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - West Virginia 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
Full Review:																				
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	845	69,731	66.17	8,653	1.79	0.83	1.48	15.07	11.72	11.09	54.35	47.46	48.19	28.78	40.00	39.02	0.01	0.00	0.22	
Limited Review:																				
13220 Beckley, WV MSA	214	21,915	16.76	1,931	0.00	0.00	0.00	7.95	6.54	5.44	81.32	78.50	77.52	10.73	14.95	17.04	0.00	0.00	0.00	
99999 WV Non-Metro Roll-up	218	28,289	17.07	1,935	0.00	0.00	0.00	10.32	5.05	6.46	56.93	51.38	46.25	32.75	43.58	47.29	0.00	0.00	0.00	
Total	1,277	119,935	100.00	12,519	1.16	0.55	1.02	13.00	9.71	9.50	59.44	53.33	52.41	26.39	36.41	36.91	0.01	0.00	0.15	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - West Virginia 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	845	69,731	66.17	8,653	22.02	7.10	6.76	17.20	16.80	16.25	19.15	20.24	23.01	41.63	44.26	42.59	0.00	11.60	11.39	
Limited Review:																				
13220 Beckley, WV MSA	214	21,915	16.76	1,931	20.65	10.75	5.85	18.15	17.29	14.60	20.72	17.29	21.08	40.48	42.06	45.52	0.00	12.62	12.95	
99999 WV Non-Metro Roll-up	218	28,289	17.07	1,935	20.27	5.05	4.34	16.26	10.09	11.11	17.58	25.69	22.74	45.88	50.46	50.18	0.00	8.72	11.63	
Total	1,277	119,935	100.00	12,519	21.47	7.36	6.25	17.19	15.74	15.20	19.14	20.67	22.67	42.19	44.95	44.21	0.00	11.28	11.67	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - West Virginia 2017-2019

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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	1,606	51,995	64.21	5,792	7.50	8.22	7.60	11.58	8.53	9.20	52.28	46.01	50.48	28.31	37.24	32.60	0.33	0.00	0.12	
Limited Review:																				
13220 Beckley, WV MSA	434	16,475	17.35	1,623	0.00	0.00	0.00	4.42	1.84	4.56	86.12	81.80	83.18	9.46	16.36	12.26	0.00	0.00	0.00	
99999 WV Non-Metro Roll-up	461	10,002	18.43	1,717	0.00	0.00	0.00	10.58	6.94	9.26	53.49	54.88	50.55	35.93	38.18	40.19	0.00	0.00	0.00	
Total	2,501	78,472	99.99	9,132	5.17	5.28	4.82	10.37	7.08	8.39	57.44	53.86	56.31	26.80	33.79	30.41	0.23	0.00	0.08	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - West Virginia 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	1,606	51,995	64.21	5,792	76.32	65.69	44.99	6.74	23.97	16.94	10.34
Limited Review:											
13220 Beckley, WV MSA	434	16,475	17.35	1,623	74.27	63.59	46.77	6.85	21.89	18.88	14.52
99999 WV Non-Metro Roll-up	461	10,002	18.43	1,717	75.18	65.94	37.22	7.35	17.79	17.47	16.27
Total	2,501	78,472	99.99	9,132	75.83	65.37	43.85	6.86	22.47	17.31	12.16

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms By Income Category of the Geography - West Virginia																			2017-2019	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review:																				
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	18	157	66.67	24	2.25	0.00	0.00	11.82	5.56	20.83	58.72	44.44	45.83	27.20	50.00	33.33	0.00	0.00	0.00	
Limited Review:																				
13220 Beckley, WV MSA	8	29	29.63	28	0.00	0.00	0.00	2.26	0.00	3.57	88.72	100.00	82.14	9.02	0.00	14.29	0.00	0.00	0.00	
99999 WV Non-Metro Roll-up	1	10	3.70	49	0.00	0.00	0.00	5.60	0.00	0.00	60.80	100.00	81.63	33.60	0.00	18.37	0.00	0.00	0.00	
Total	27	196	100.00	101	1.52	0.00	0.00	9.23	3.70	5.94	64.10	62.96	73.27	25.16	33.33	20.79	0.00	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - West Virginia												2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		
Full Review:													
99999 Charleston-Huntington-Ashland, WV-OH-KY CSA	18	157	66.67	24.00	95.31	83.33	45.83	2.25	5.56	2.44	11.11		
Limited Review:													
13220 Beckley, WV MSA	8	29	29.63	28.00	95.49	75.00	21.43	0.75	0.00	3.76	25.00		
99999 WV Non-Metro Roll-up	1	10	3.70	49.00	98.40	100.00	44.90	0.80	0.00	0.80	0.00		
Total	27	196	100.00	101	95.83	81.48	38.61	1.77	3.70	2.40	14.81		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Wisconsin																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate		
Full Review:																					
33340 Milwaukee-Waukesha, WI MSA	7,506	1,765,817	54.64	47,498	7.32	1.77	4.13	11.91	9.06	11.11	36.25	34.08	37.21	44.52	55.09	47.55	0.00	0.00	0.00		
Limited Review:																					
99999 Appleton-Oshkosh-Neenah, WI CSA (2017-2018)	737	116,403	5.36	14,011	0.00	0.00	0.00	9.44	10.04	9.81	73.73	68.52	73.09	16.83	21.44	17.11	0.00	0.00	0.00		
99999 Appleton-Oshkosh-Neenah, WI CSA (2019)	370	66,147	2.69	N/A	0.00	0.00	N/A	9.44	9.19	N/A	73.73	71.08	N/A	16.83	19.73	N/A	0.00	0.00	N/A		
22540 Fond du Lac, WI MSA	221	33,268	1.61	2,605	1.18	1.36	1.69	2.54	3.17	2.88	87.10	86.43	85.83	9.19	9.05	9.60	0.00	0.00	0.00		
99999 Green Bay-Shawano, WI CSA	926	154,030	6.74	8,542	1.17	0.65	1.56	21.45	19.33	20.71	50.03	46.54	46.64	27.35	33.48	31.09	0.00	0.00	0.00		
99999 Madison-Janesville-Beloit, WI CSA (2017-2018)	1,271	289,739	9.25	27,348	0.82	0.24	0.98	12.09	11.25	11.06	54.51	49.72	53.91	32.58	38.79	34.00	0.01	0.00	0.05		
99999 Madison-Janesville-Beloit, WI CSA (2019)	630	164,653	4.59	N/A	0.82	1.11	N/A	12.09	10.95	N/A	54.51	47.62	N/A	32.58	40.32	N/A	0.01	0.00	N/A		
39540 Racine, WI MSA	701	115,467	5.10	6,431	2.69	0.71	1.38	16.13	13.55	15.47	57.36	60.91	59.28	23.64	24.82	23.57	0.17	0.00	0.30		
99999 WI Non-Metro Roll-up	1,376	300,184	10.02	13,157	0.00	0.00	0.00	2.25	1.96	2.40	67.79	63.52	71.56	29.90	34.45	25.99	0.06	0.07	0.05		
Total	13,738	3,005,708	100.00	119,592	2.75	1.14	2.09	11.05	9.52	10.73	54.27	44.99	51.93	31.92	44.34	35.22	0.02	0.01	0.03		

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Wisconsin 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Full Review:																				
33340 Milwaukee-Waukesha, WI MSA	7,506	1,765,817	54.64	47,498	23.46	5.44	7.59	16.18	18.88	18.10	19.42	22.98	22.49	40.94	47.97	40.75	0.00	4.73	11.07	
Limited Review:																				
99999 Appleton-Oshkosh-Neenah, WI CSA (2017-2018)	737	116,403	5.36	14,011	18.34	9.63	9.35	18.54	24.69	23.09	24.54	26.87	23.85	38.58	32.16	32.35	0.00	6.65	11.36	
99999 Appleton-Oshkosh-Neenah, WI CSA (2019)	370	66,147	2.69	N/A	18.34	8.65	N/A	18.54	31.62	N/A	24.54	22.70	N/A	38.58	34.32	N/A	0.00	2.70	N/A	
22540 Fond du Lac, WI MSA	221	33,268	1.61	2,605	17.01	6.79	11.79	18.38	28.96	25.11	25.17	22.62	23.57	39.43	34.84	28.14	0.00	6.79	11.40	
99999 Green Bay-Shawano, WI CSA	926	154,030	6.74	8,542	19.93	9.40	9.49	18.15	25.38	21.13	21.39	28.19	22.75	40.53	34.13	33.84	0.00	2.92	12.78	
99999 Madison-Janesville-Beloit, WI CSA (2017-2018)	1,271	289,739	9.25	27,348	19.48	6.37	7.25	17.03	19.43	18.76	22.36	22.66	26.29	41.13	44.14	39.74	0.00	7.40	7.97	
99999 Madison-Janesville-Beloit, WI CSA (2019)	630	164,653	4.59	N/A	19.48	6.67	N/A	17.03	19.84	N/A	22.36	26.19	N/A	41.13	45.71	N/A	0.00	1.59	N/A	
39540 Racine, WI MSA	701	115,467	5.10	6,431	19.97	7.42	12.53	17.80	21.26	20.60	21.90	23.54	21.77	40.33	40.37	32.05	0.00	7.42	13.05	
99999 WI Non-Metro Roll-up	1,376	300,184	10.02	13,157	15.32	3.92	6.82	17.81	15.63	20.00	22.29	19.55	22.85	44.59	49.56	39.08	0.00	11.34	11.25	
Total	13,738	3,005,708	100.00	119,592	20.21	6.49	8.13	17.21	21.21	19.55	21.76	24.71	23.56	40.82	47.59	38.12	0.00	5.59	10.65	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' 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 - Wisconsin 2017-2019

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	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	% of Business	% Bank Loans	% Aggregate	
Full Review:																				
33340 Milwaukee-Waukesha, WI MSA	14,969	271,816	49.93	28,731	10.88	4.42	8.17	11.91	8.00	10.02	34.99	32.60	34.06	42.18	54.97	47.73	0.04	0.00	0.02	
Limited Review:																				
99999 Appleton-Oshkosh-Neenah, WI CSA (2017-2018)	1,546	29,997	5.16	5,429	0.00	0.00	0.00	13.65	11.58	12.89	71.76	69.15	70.36	14.59	19.28	16.74	0.00	0.00	0.00	
99999 Appleton-Oshkosh-Neenah, WI CSA (2019)	1,179	18,162	3.93	N/A	0.00	0.00	N/A	13.59	11.79	N/A	71.65	68.53	N/A	14.75	19.68	N/A	0.00	0.00	N/A	
22540 Fond du Lac, WI MSA	563	8,235	1.88	1,342	9.15	6.57	6.86	5.21	6.22	3.28	78.12	79.93	80.03	7.53	7.28	9.84	0.00	0.00	0.00	
99999 Green Bay-Shawano, WI CSA	1,641	30,093	5.47	4,465	3.45	2.86	3.20	27.80	23.10	27.35	44.59	43.88	42.58	24.15	30.16	26.88	0.02	0.00	0.00	
99999 Madison-Janesville-Beloit, WI CSA (2017-2018)	3,298	50,384	11.00	9,936	2.38	1.09	1.59	15.81	13.13	14.30	46.79	44.85	46.83	33.26	38.60	35.90	1.76	2.33	1.38	
99999 Madison-Janesville-Beloit, WI CSA (2019)	2,399	35,406	8.00	N/A	2.24	1.54	N/A	15.57	12.30	N/A	46.68	46.06	N/A	33.62	38.06	N/A	1.90	2.04	N/A	
39540 Racine, WI MSA	1,550	29,496	5.17	2,936	5.28	2.90	4.22	18.47	13.10	16.93	54.18	58.65	54.33	19.19	22.19	21.36	2.88	3.16	3.17	
99999 WI Non-Metro Roll-up	2,836	50,637	9.46	5,334	0.00	0.00	0.00	3.14	2.40	2.49	72.66	66.18	65.37	23.91	31.42	31.98	0.30	0.00	0.15	
Total	29,981	524,226	100.00	58,173	5.00	2.88	4.92	13.59	9.77	11.85	49.25	44.35	45.24	31.43	42.41	37.57	0.74	0.58	0.42	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses Loans by Gross Annual Revenues - Wisconsin 2017-2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans
Full Review:											
33340 Milwaukee-Waukesha, WI MSA	14,969	271,816	49.93	28,731	80.67	63.35	44.88	8.31	21.28	11.02	15.37
Limited Review:											
99999 Appleton-Oshkosh-Neenah, WI CSA (2017-2018)	1,546	29,997	5.16	5,429	75.49	60.67	45.70	8.49	22.12	16.03	17.21
99999 Appleton-Oshkosh-Neenah, WI CSA (2019)	1,179	18,162	3.93	N/A	77.67	64.72	N/A	7.58	22.73	14.76	12.55
22540 Fond du Lac, WI MSA	563	8,235	1.88	1,342	78.74	58.97	51.49	7.04	28.42	14.22	12.61
99999 Green Bay-Shawano, WI CSA	1,641	30,093	5.47	4,465	76.66	62.77	45.38	9.29	24.56	14.05	12.68
99999 Madison-Janesville-Beloit, WI CSA (2017-2018)	3,298	50,384	11.00	9,936	80.68	67.74	47.55	7.12	15.55	12.20	16.71
99999 Madison-Janesville-Beloit, WI CSA (2019)	2,399	35,406	8.00	N/A	81.94	69.78	N/A	6.38	16.47	11.68	13.76
39540 Racine, WI MSA	1,550	29,496	5.17	2,936	81.22	66.45	43.22	7.40	19.03	11.38	14.52
99999 WI Non-Metro Roll-up	2,836	50,637	9.46	5,334	79.50	62.87	46.12	7.01	21.02	13.49	16.11
Total	29,981	524,226	100.00	58,173	79.98	64.26	45.63	7.64	20.54	12.38	15.20

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	% of Farms	% Bank Loans	% Aggregate	
Full Review :																				
33340 Milwaukee-Waukesha, WI MSA	104	878	18.54	170	5.65	0.00	1.76	6.99	5.77	1.18	38.22	40.38	49.41	49.14	53.85	47.65	0.00	0.00	0.00	
Limited Review :																				
99999 Appleton-Oshkosh- Neenah, WI CSA (2017- 2018)	44	1,612	7.84	213	0.00	0.00	0.00	7.24	0.00	3.76	79.87	68.18	83.57	12.89	31.82	12.68	0.00	0.00	0.00	
99999 Appleton-Oshkosh- Neenah, WI CSA (2019)	35	414	6.24	N/A	0.00	0.00	N/A	7.88	2.86	N/A	79.03	77.14	N/A	13.10	20.00	N/A	0.00	0.00	N/A	
22540 Fond du Lac, WI MSA	46	386	8.20	131	1.41	0.00	1.53	0.70	0.00	0.00	88.06	84.78	81.68	9.84	15.22	16.79	0.00	0.00	0.00	
99999 Green Bay-Shawano, WI CSA	33	567	5.88	83	0.97	0.00	0.00	10.44	0.00	1.20	49.52	42.42	54.22	39.07	57.58	44.58	0.00	0.00	0.00	
99999 Madison-Janesville- Beloit, WI CSA (2017- 2018)	62	3,554	11.05	332	0.44	0.00	0.60	5.66	0.00	1.20	53.00	64.52	52.11	40.72	35.48	46.08	0.19	0.00	0.00	
99999 Madison-Janesville- Beloit, WI CSA (2019)	58	853	10.34	N/A	0.71	0.00	N/A	5.68	1.72	N/A	53.27	55.17	N/A	40.10	43.10	N/A	0.24	0.00	N/A	
39540 Racine, WI MSA	18	136	3.21	68	1.07	0.00	0.00	5.61	0.00	0.00	58.02	88.89	48.53	35.29	11.11	51.47	0.00	0.00	0.00	
99999 WI Non-Metro Roll-up	161	3,992	28.70	515	0.00	0.00	0.00	0.90	0.62	0.19	66.31	70.81	68.74	32.79	28.57	31.07	0.00	0.00	0.00	
Total	561	12,392	100.00	1,512	1.35	0.00	0.46	5.51	1.60	1.06	58.78	63.10	64.42	34.28	35.29	34.06	0.08	0.00	0.00	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Wisconsin											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Businesses	% Bank Loans	% Aggregate	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	
Full Review:												
33340 Milwaukee-Waukesha, WI MSA	104	878	18.54	170.00	93.58	69.23	47.06	4.36	8.65	2.06	22.12	
Limited Review:												
99999 Appleton-Oshkosh- Neenah, WI CSA (2017- 2018)	44	1,612	7.84	213.00	95.45	68.18	34.74	2.88	11.36	1.67	20.45	
99999 Appleton-Oshkosh- Neenah, WI CSA (2019)	35	414	6.24	0.00	95.88	77.14	N/A	2.93	17.14	1.19	5.71	
22540 Fond du Lac, WI MSA	46	386	8.20	131.00	95.08	60.87	46.56	4.45	19.57	0.47	19.57	
99999 Green Bay-Shawano, WI CSA	33	567	5.88	83.00	93.04	75.76	37.35	5.03	15.15	1.93	9.09	
99999 Madison-Janesville- Beloit, WI CSA (2017- 2018)	62	3,554	11.05	332.00	95.99	74.19	49.70	2.42	11.29	1.60	14.52	
99999 Madison-Janesville- Beloit, WI CSA (2019)	58	853	10.34	0.00	95.79	62.07	N/A	2.51	20.69	1.70	17.24	
39540 Racine, WI MSA	18	136	3.21	68.00	94.65	83.33	55.88	4.01	5.56	1.34	11.11	
99999 WI Non-Metro Roll-up	161	3,992	28.70	515.00	95.76	52.80	37.48	3.28	21.12	0.95	26.09	
Total	561	12,392	100.00	1,512	95.22	64.88	42.46	3.25	15.69	1.53	19.43	

Source: 2015 ACS; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, 'N/A' data not available.

Due to rounding, totals may not equal 100.0