



PUBLIC DISCLOSURE

March 11, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

1111 Polaris Parkway
Columbus, OH 43240

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street, SW
Washington, DC 20219

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

Table of Contents

Overall Community Reinvestment Act (CRA) Rating	4
Description of Institution	5
Scope of the Evaluation	6
Discriminatory or Other Illegal Credit Practices Review	13
Multistate Metropolitan Statistical Area Ratings (MMSA)	15
New York-Newark, NY-NJ-CT-PA CSA (New York CSA)	15
Chicago-Naperville, IL-IN-WI CSA (Chicago CSA).....	29
Portland-Vancouver-Salem, OR-WA CSA (Portland CSA)	42
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA (Louisville CSA).....	54
Cincinnati, OH-KY-IN MMSA (Cincinnati MMSA).....	65
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA (DC CSA).....	76
Boston-Worcester-Providence, MA-RI-NH-CT CSA (Boston CSA)	89
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MMSA (Philadelphia MMSA)	102
St. Louis, MO-IL MMSA (St. Louis MMSA).....	115
Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)	127
Kansas City-Overland Park-Kansas City, MO-KS CSA (Kansas City CSA)	138
Wheeling, WV-OH MMSA (Wheeling MMSA)	149
Allentown-Bethlehem-Easton, PA-NJ MMSA (Allentown MMSA).....	159
Omaha-Council Bluffs, NE-IA MMSA (Omaha MMSA)	170
State Ratings	181
State of Alabama	181
State of Arizona.....	192
State of Arkansas	206
State of California	218
State of Colorado	256
State of Connecticut	271
State of Florida	282
State of Georgia.....	307
State of Idaho.....	321
State of Illinois	335
State of Indiana.....	349
State of Iowa.....	364
State of Kansas	376
State of Kentucky	387
State of Louisiana	401
State of Maine	416

State of Massachusetts.....	427
State of Michigan	440
State of Minnesota.....	455
State of Mississippi	467
State of Montana	478
State of Nebraska.....	490
State of Nevada	501
State of New Mexico	514
State of New York.....	525
State of North Carolina.....	548
State of North Dakota.....	561
State of Ohio.....	572
State of Oklahoma	587
State of Oregon.....	600
State of Pennsylvania	613
State of South Carolina.....	626
State of South Dakota.....	639
State of Tennessee	650
State of Texas	662
State of Utah.....	687
State of Vermont	701
State of Virginia	711
State of Washington	724
State of West Virginia	739
State of Wisconsin.....	752
State of Wyoming.....	767
Appendix A: Scope of Examination	779
Appendix B: Summary of CSA/MMSA and State Ratings	791
Appendix C: Definitions and Common Abbreviations.....	793
Appendix D: Tables of Performance Data.....	796

Overall Community Reinvestment Act (CRA) Rating

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

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

Performance Levels	JPMorgan Chase Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The major factors that support this rating include:

Lending Test

JPMCB's overall lending performance is rated Outstanding based on excellent lending performance in 31 of the 56 rating areas. Lending performance was good in 23 rating areas and adequate in the two remaining rating areas.

The bank achieved good distribution of loans to borrowers and small businesses of different income levels in all 56 rating areas. Distribution of loans to borrowers in different geographies was excellent in one rating area, good in 13 rating areas, adequate in 34 rating areas, and poor in eight rating areas.

The bank was a leader in making community development (CD) loans. The bank's CD lending volume and nature of CD lending had a positive influence on the Lending Test performance.

The institution makes significant use of innovative and/or flexible loan products to meet the AA's credit needs.

Investment Test

JPMCB's overall investment performance is rated Outstanding based on excellent investment performance in 46 of the 56 rating areas. Investment performance was good in eight rating areas, and adequate in two rating areas.

Service Test

JPMCB's overall service performance is rated Outstanding based on excellent service performance in 39 of the 56 rating areas. Service performance was good in 16 rating areas and adequate in one rating area.

Retail delivery systems are readily accessible in 38 of 56 rating areas. During the evaluation period, the bank significantly increased its branch footprint from 31 states to 48 states and the District of Columbia.

In 39 of 56 rating areas, the bank was a leader in providing CD services. The bank provided a relatively high level of CD services in the other 17 rating areas.

Description of Institution

JPMorgan Chase & Co. (JPMC or the firm) is the nation's largest global financial holding company with \$3.9 trillion in total assets as of December 31, 2023. Headquartered in New York City, JPMC operates domestically and globally through subsidiaries, affiliates, joint ventures, representative offices, international branches, and subsidiary foreign banks. JPMC 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.

JPMCB is the principal bank subsidiary of JPMC. JPMCB is a national bank with its main office in Columbus, Ohio, and headquarters also in New York City. JPMCB is a global commercial bank and the largest bank in the U.S. with total assets of \$3.4 trillion and domestic deposits of \$2 trillion as of December 31, 2023. JPMCB held \$460 billion in foreign deposits, which are not Federal Deposit Insurance Corporation (FDIC)-insured and are held in non-U.S. branches. JPMCB held \$262 billion in tier 1 capital, which was adjusted to \$146 billion for this evaluation. Most of JPMC's business is conducted through JPMCB, except for certain asset management products and services, US broker-dealer activities, and private equity. JPMCB provides financial services to millions of consumers and businesses in the U.S, as well as large corporation, institutional, and government clients in 60 countries globally. During the evaluation period, the bank's organizational structure consisted of five lines of business: Consumer and Community Banking, Corporate and Investment Banking, Commercial Bank, Asset and Wealth Management, and International Consumer Bank as well as the Corporate Sector.

JPMCB provides a full suite of consumer and commercial banking services in 48 states and the District of Columbia through a branch network of 4,897 branches and 15,735 deposit-taking automated teller machines (ATMs), with all ATMs offering a full range of services. JPMCB's lending products include commercial and small business loans, consumer loans, and residential real estate loans, Small Business Administration (SBA) guaranteed loans, and other specialized lending programs. In 2023, the bank's net loans comprised of 38.5 percent of total assets. Domestic loans consisted of 28 percent residential real estate, 15.3 percent credit card, 13.7 percent commercial loans, 12.7 percent for commercial real estate, 7.2 percent for consumer (excluding credit card), and 23.1 percent other loans. Deposit products include business and personal checking, savings, and time deposit accounts. JPMCB retail products and services are also available through call centers and mobile or internet access on a 24-hour basis.

JPMCB's subsidiaries include trust operations, property management companies, and leasing companies. The bank also operates through affiliates and joint ventures. Applicable loans originated by these parties within JPMCB assessment areas (AAs) were considered during this performance evaluation. JPMorgan Chase Foundation also extends grant funding, which examiners also considered for this evaluation. See appendix A: Scope of Evaluation, for detail about affiliates, subsidiaries and joint ventures and their products reviewed for each entity.

For this performance evaluation, JPMCB's geographic footprint is the District of Columbia and the following 48 states: Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida,

Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming. Within its U.S. footprint, the bank has delineated over 191 AAs. This evaluation reviewed 14 multistate combined Statistical Areas (CSA) and metropolitan statistical area (MSA), where the bank operates in at least two states. There were two rating areas representing four AAs that the bank entered on July 1, 2023, or later which were out of scope for the evaluation period. JPMCB entered five AAs during the first half of 2023, which examiners considered as performance context when evaluating these AAs.

During the evaluation period, JPMCB created a Community Branch Program to revitalize or build community-style branch locations. Through this program, the bank established community-style branches and hired local community leaders to help improve access to banking and financial health. These branches were designed with modern furnishings and upgrades and include additional seating to host events. As of the end of the evaluation period, the bank had 299 of these branches in their network. Of the total community-style branches, 16 are classified as Community Center Branches. These locations offer resources such as free Wi-Fi, financial health workshops, skills training, and space for local small business pop-up shops and/or community events hosted by nonprofit organizations.

The OCC assigned JPMCB an overall Satisfactory rating in its prior CRA evaluation, dated March 2, 2020. This prior evaluation covered the period between January 1, 2014, through December 31, 2019. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC used Interagency Large Institution CRA Examination Procedures to conduct the bank's CRA performance evaluation covering CRA-related activities from January 1, 2020, through December 31, 2023. Examiners considered JPMCB's Home Mortgage Disclosure Act (HMDA)-reportable loans (consisting of home purchase, home improvement and home refinance), small business lending (including business credit cards), small farm lending, CD lending, grants, donations, and other investments, as well as retail banking and CD services. Examiners also considered any other loan data such as letters of credit used to support CD activities. Examiners did not consider consumer lending, which included automobile loans and consumer credit cards, in this evaluation, as consumer lending was not a substantial majority of JPMCB's business and management did not request consideration of these loans.

On June 5, 2020, the OCC published a modernized CRA Rule. The June 2020 CRA Rule was subsequently rescinded on December 14, 2021, but was in effect from October 1, 2020, until December 31, 2021. While in effect, the rule expanded lending, investment, and services activities that qualified for positive CRA consideration. An activity that met the qualifying criteria under the June 2020 CRA rule that JPMCB conducted between October 1, 2020, and December 31, 2021, remained a qualifying activity even after rescission of the June 2020 CRA rule and were included in this evaluation. This included activities that met the credit needs of economically disadvantaged individuals and entities, low- and moderate-income geographies, and other identified areas of need in banks' communities, as well as

expanded the circumstances in which banks received pro-rata consideration for qualifying activities. The June 2020 CRA Rule also allowed for the allocation of an activity across all of a bank's AAs served by the activity according to the share of the bank's deposits in those areas, to the extent the bank cannot document that the services or funding it provided was allocated to a particular project.

Due to updated 2020 Census data, census tract income level designation changes became effective January 1, 2022. For the Lending Test, examiners must analyze loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage loans and small loans to businesses and farm data from January 1, 2020, through December 31, 2021 (2020 through 2021 analysis period), using 2015 American Community Survey (ACS) demographic information. Examiners analyzed home mortgage loans and small loans to businesses and farms data from January 1, 2022, through December 31, 2023, (2022 through 2023 analysis period), using 2020 Census demographic information. Examiners aggregated lending performance for the 2020 through 2021 analysis period and the 2022 through 2023 analysis period to conclude on JPMCB's overall performance under the Lending Test for the entire evaluation period. Unless otherwise noted in a specific rating area, examiners placed equal consideration to both analysis periods. See appendix D for data for both analysis periods.

In evaluating performance under the Lending, Investment, and Service Tests, the MSAs within the CSA were combined. The Office of Management and Budget (OMB) issued OMB Bulletin No. 23-01 on July 21, 2023, that revised delineations of MSA, micropolitan statistical areas (MiSA), and CSA. These delineations updated and superseded OMB Bulletin No. 20-01, issued on March 6, 2020. The OCC used the OMB delineations from OMB Bulletin No. 20-01 for analysis purposes as they were in effect for the vast majority of the evaluation period and any variances would not have a meaningful impact on conclusions. Analysis for the Investment Test, Service Test, and CD investments and services evaluations, respectively, are not impacted by Census data OMB changes. These data are combined for the calendar years 2020 through 2023. However, under the Service Test, consideration was given to the impact the 2020 Census made to change the classification of low- and moderate-income geographies, where branches were located.

In some AAs, there were no low-income geographies during part of or the entire evaluation period. For these AAs, geographic conclusions in the Lending Test and Service Test were based on performance in moderate-income geographies. In three instances, an AA had no low- or moderate-income geographies. For these AAs, the distribution of lending conclusion under the Lending Test was based solely on the distribution of borrowers by income and businesses or farms by size, while Service Test conclusions were based on the non-geographic components and performance context. The Scope of Evaluation in each state rating area identifies any AAs without low- or moderate-income geographies.

Description of Factors Considered Under Each Performance Test

Considerations made to assess the bank's CRA performance over the evaluation period were as follows:

Lending Test

Examiners considered qualifying activities performed in response to the significant impact the COVID-19 pandemic had across the United States during the evaluation period. This included consideration of loans made under the SBA's Paycheck Protection Program (PPP), which helped small businesses weather substantial revenue declines and preserve liquidity during the crisis. JPMCB originated these

loans as either small loans to businesses or farms under the borrower and geographic distribution of lending analysis, or as CD loans, depending on their size. From 2020 to 2021, JPMCB originated more than \$40 billion in loans to small businesses through the PPP, accounting for more than 400,000 CRA-eligible loans.

Generally, examiners did not draw conclusions for a loan product if there were less than 20 originated or purchased loans in an AA. In most markets, JPMCB made few, if any, small loans to farms as farm lending was not a strategic focus nor a primary product for the bank. Some of the bank's AAs that contain more rural geographies had enough small loans to farms to analyze. Due to the limited number of farms in low- and moderate-income geographies, small farm lending had no material impact on the Lending Test conclusion. If examiners included an analysis of these loans in a rating area, they noted it in the narrative for the applicable rating area.

Examiners reviewed summary reports and maps of loan originations and purchases for home mortgage loans, small loans to business, and small loans to farms over the evaluation period to assess if there are any gaps in the geographic distribution of loans in all full-scope AAs.

Lending Activity

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

Distribution of Loans by Income Level of Geography or Borrower

For lending performance, the loan distribution analyses compared originated and purchased home mortgage loans, small loans to businesses, and small loans to farms to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrated how the bank was performing compared to other lenders in the AA and provided context on the reasonableness of the bank's performance. For the 2020 through 2021 analysis period, peer aggregate lending data for HMDA loans, small loans to businesses, and small loans to farms was from 2021. For the 2022 through 2023 analysis period, peer aggregate data for HMDA loans was from 2023 and peer aggregate data for small loans to businesses and small loans to farms was from 2022, as 2023 data was not available. Unless indicated, examiners placed equal emphasis on borrower and geographic demographic distributions when compared to aggregate performance.

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated examiners should consider one component more than the other. In addition, when there were differences in performance between loan products in a specific AA, examiners determined the overall conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount. For every AA, small loans to businesses received more consideration than home mortgage loans. When there was a sufficient volume of small loans to farms for evaluation, that product received the least weight among the three product types.

When there were performance differences between low- and moderate-income geographies, examiners generally placed more emphasis on the geographic category with more lending opportunities (e.g., higher percentage of businesses or owner-occupied housing units). For example, examiners gave more consideration to moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms. Examiners described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families. Home affordability for low- and moderate-income borrowers in higher cost areas was considered. Examiners compared an estimated monthly mortgage payment to the maximum gross monthly income for low- and moderate-income borrowers. Mortgage payment was calculated using the median housing value reported by the U.S. Census, assuming a 30-year mortgage with a 5 percent fixed interest rate and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses. Housing was generally considered difficult for many low- and moderate-income borrowers to afford if the calculated mortgage payment exceeds 30 percent of gross monthly income.

CD Lending

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex or responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. To provide perspective, CD lending volume was compared to JPMCB's adjusted tier 1 capital based on the pro rata share of bank deposits attributed to that area. The impact of non-local deposits and foreign deposits on the bank's lending capacity was considered in the CD loans analysis. Examiners adjusted the tier 1 capital to \$146 billion to account for non-local deposits centralized in the New York and Houston CSAs and deposits held by foreign counterparties, mortgage escrows, brokered, intercompany, and government entities. High levels of tier 1 capital can cause the ratio of CD lending relative to tier 1 capital to appear low when compared to the CD ratios at other banks. The length of an evaluation period can also impact the levels of CD activity relative to tier 1 capital as banks with longer evaluation periods have more time to make more loans relative to a bank with a shorter evaluation period.

Product Innovation and Flexibility

Examiners evaluated the suite of products offered by JPMCB to determine how innovative and/or flexible home mortgage and small business lending programs serve AA credit needs. Flexible lending programs included Special Purpose Credit Programs (SPCP) for both home lending and small business lending. JPMCB products considered include DreaMaker mortgage, Home Lending SPCP, Veterans Affairs (VA) guaranteed loans, Federal Housing Administration (FHA) insured loans, Business Banking SPCP, Business Card SPCP, SBA loans, and PPP loans. In addition, JPMCB has established several self-funded grant programs including Homebuyer Education Benefit, Chase Homebuyer Grant, VA Purchase Closing Benefit, and the Affordable Housing Preservation Program. These products and programs complement the bank's existing suite of products, which examiners considered in the "Product Innovation and Flexibility" section for those AAs that had significant activity in these products.

Investment Test

In conducting the Investment Test, examiners assessed JPMCB's qualified investment portfolio as well as donations and grants made during the evaluation period that had CD as the primary purpose. Examiners considered investments that met the CD definition, which the bank made in the current evaluation period and those made prior to the current evaluation period that were outstanding. Examiners considered current-period investments at their original investment amount, and prior-period investments at the book value of the investment as of December 31, 2023. JPMCB received consideration for any qualified investment activity that benefited a specific AA in the applicable state or CSA/MMSA rating area. This included investments in the broader statewide or regional area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA (referred to as "Direct Benefit"). Examiners also considered investments made in the broader statewide or regional activities that did not serve an AA only if the bank had reasonably served the needs of its AAs (referred to as "Indirect Benefit").

Examiners compared the bank's level of qualified investments in an AA to JPMCB's adjusted tier 1 capital to provide perspective. Tier 1 capital was adjusted to account for non-local deposits centralized in the New York and Houston CSAs and deposits held by foreign counterparties, mortgage escrows, brokered, intercompany, and government entities. Examiners compared the bank's qualified investments to the same adjusted pro rata share of deposits and associated tier 1 capital used for CD lending comparisons. Examiners considered the level of competition for these investments from other banking institutions within specific AAs.

Examiners considered the responsiveness of the bank's investment portfolio in meeting credit and the CD needs of the communities. Examiners also considered the complexity and innovativeness of investments, including the expertise required to execute the investment and the use of multiple funding sources. Complex investments included Low Income Housing Tax Credits (LIHTC), Historic Tax Credits (HTC), or 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 participation 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

In conducting the Service Test, examiners assessed the availability and effectiveness of delivering retail banking services to customers in the bank's communities, particularly low- and moderate-income individuals. The review included an analysis of JPMCB's branch network and deposit-taking ATMs. Examiners gave the most weight to the geographic distribution of bank branches and changes in branch locations. In AAs where JPMCB opened or closed branches during the evaluation period, examiners assessed the impact of those changes on the distribution of the bank's branches in low- and moderate-income geographies. During the evaluation period, the bank continued to execute ongoing control processes when determining whether to close or consolidate its retail branches. The bank considered the following factors in its branch action decision-making process: 1) branch redundancy or proximity to other JPMCB locations or ATMs, 2) low transaction volumes, 3) customer behaviors in the market, including migration to digital banking capabilities, and 4) its broader business strategy to exit in-store

branch locations. JPMCB includes several departments, including its CRA personnel, in discussions to assess and mitigate any negative impact of branch closures to low- and moderate-income customers and communities.

The analysis of the distribution of the bank's retail branches was based on locations as of December 31, 2023. The geography income-category classifications of the bank's AAs were based on the 2020 Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted from a geography's income classification change from the 2015 ACS to the 2020 Census. Examiners considered that the 2020 Census changes were released during the midpoint of the evaluation period. Analysis of branch openings and closings was based on the geography's income-category classification at the time the branch opened or closed.

In the full-scope AAs, examiners reviewed branch locations in middle- and upper-income geographies that served and improved access for low- and moderate-income customers or customers in low- and moderate-income geographies. Examiners gave positive consideration when a middle- and upper-income branch was less than 1,000 feet from a low- or moderate-income geography. Examiners also considered data that the bank provided on the usage of branches in middle- and upper-income by customers living in low- or moderate-income geographies. Examiners assessed the transaction penetration of low- or moderate-income customers using middle- and upper-income branches compared to the percentage of the population that was considered low- or moderate-income. Examiners did not include these branches as part of JPMCB's branch distribution, but as additional performance context when concluding on the accessibility of the bank's service delivery systems in each of its AAs.

Examiners considered the other alternative delivery systems (ADS) that the bank offered and assessed if the ADS increased accessibility for both retail and business customers. These systems included full-service deposit-taking ATMs, mobile banking, telephone banking, online banking, and the bank's own secure banking retail deposit product. Examiners positively considered ADS usage where bank data demonstrated that systems usage increased over the evaluation period compared to the change in the number of low- and moderate-income customers.

In AAs receiving a full-scope review, examiners also considered the extent and innovativeness of JPMCB's CD services within its AAs. The primary consideration of the analysis of CD services was the responsiveness to the credit needs of the AAs. During this evaluation period, JPMCB partnered with Credit Counseling Agencies (CCA) across the country to assist customers in need of financial assistance. CCAs are non-profit organizations that specialize in financial education, guidance, advocacy, and support. CCAs employ certified credit counselors to provide comprehensive financial assessments and budget counseling to customers experiencing financial stress. In accordance with CRA guidance, examiners gave CRA consideration for the credit counseling provided by CCAs' services on behalf of JPMCB by CCA certified credit counselors (affiliate or third party). The services offered by CCAs include budget counseling, debt management plans to pay credit card balances and other bills, housing counseling (primarily foreclosure prevention), student loan counseling, bankruptcy counseling and education, and financial education.

Selection of Areas for Full-Scope Review

Examiners selected a multistate metropolitan statistical area (MMSA) or multistate CSA for a full-scope review if the bank had branches or deposit-taking ATMs in two or more states that make up the MMSA/CSA. Rating areas and AAs the bank entered on July 1, 2023, or later are out of scope for the

evaluation period. JPMCB entered five AAs during the first half of 2023, which examiners considered as performance context when evaluating these AAs.

The bank had branches or deposit-taking ATMs in 646 counties throughout the 48 contiguous United States of America and the District of Columbia. In states where the bank had an office or a deposit-taking ATM, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, examiners combined and evaluated bank-delineated AAs located within the same MSA, CSA, or MMSA as a single AA. Similarly, examiners combined and evaluated bank-delineated non-MSA AAs within the same state as a single AA. Examiners evaluated these combined AAs using full- or limited-scope procedures. After the consolidation mentioned above, the states, MMSA, and CSAs comprised 56 rating areas: 14 multistate CSAs and MMSAs and 42 states. Examiners selected 61 AAs for full-scope reviews. Refer to the Scope section under each State Rating section for details regarding how full-scope AAs were selected.

When determining areas for full-scope reviews, examiners considered factors such as JPMCB's percentage of deposits within the rating area, the number of branches, the volume of reportable loans originated and purchased in each state and/or MMSA, the significance of the bank to the AA based on its deposit market share and rank, comments received from the public, business strategy within a particular MMSA/CSA or state, and conclusions from prior CRA evaluations. Where necessary, examiners selected multiple AAs to complete sufficient full-scope analyses to support the conclusions and ratings.

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 serve and did not arbitrarily exclude any low- and moderate-income geographies.

Refer to appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the CSA, MMSA, and state ratings. The PE is presented by CSA or MMSA rating area in deposit rank order followed by each state in alphabetical order. Overall ratings are a weighted average, based on deposits, of the 14 CSAs/MMSAs and 42 state ratings.

Conclusions and ratings derived under each test were based on performance across all rating areas. Performance ratings were not based solely on the performance in the full-scope AAs but also considered performance in the limited-scope AAs. Examiners primarily used quantitative data when evaluating limited-scope AAs, 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.

The top five rating areas carried the greatest weight when determining overall conclusions. These rating areas were the New York CSA, state of California, state of Texas, Chicago CSA, and state of Florida. These rating areas represented the bank's most significant markets, accounting for 62.3 percent of the bank's lending, 73.8 percent of adjusted deposits, and 57.9 percent of branches. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how examiners weighted the areas in arriving at the respective ratings.

Lending in Assessment Area

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

The bank originated and purchased 89 percent of its total loans inside the bank's AAs during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This table also does not include home mortgage loans that JPMCB acquired from First Republic Bank after its May 1, 2023, closure by the California Department of Financial Protection and Innovation and subsequent asset seizure by the FDIC.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	983,266	91.2	94,999	8.8	1,078,265	470,085,227	94.0	29,870,059	6.0	499,955,286
Small Business	4,667,263	89.1	569,712	10.9	5,236,975	87,926,481	92.8	6,833,382	7.2	94,759,863
Small Farm	40,986	52.8	36,686	47.2	77,672	507,685	55.9	400,341	44.1	908,026
Total	5,691,515	89.0	701,397	11.0	6,392,912	558,519,393	93.8	37,103,782	6.2	595,623,175
Source: Bank Data. Due to rounding, totals may not equal 100.0%										

Source: Bank Data. Due to rounding, totals may not equal 100.0%

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), in determining a national bank's CRA rating, the OCC considered evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans had been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consulted 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 Consumer Financial Protection Bureau, as applicable.

The OCC did not identify that JPMCB (or any affiliate whose loans have been considered as part of the institution's lending performance) engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; 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 JPMCB engaged in discriminatory or other illegal credit practices identified by or provided to the OCC before the end of JPMCB's next performance evaluation in that subsequent evaluation, even if the information concerned activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Ratings (MMSA)

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

CRA rating for the New York CSA¹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- The bank was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in New York CSA

The New York CSA was comprised of the entire Bridgeport-Stamford-Norwalk CT (Bridgeport) MSA, Kingston, NY (Kingston) MSA, New Haven-Milford, CT (New Haven) MSA, Poughkeepsie-Newburgh-Middletown, NY (Poughkeepsie) MSA, and Trenton-Princeton, NJ (Trenton) MSA, and a majority of the New York-Newark-Jersey City, NY-NJ-PA (New York) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The New York CSA is JPMCB's largest retail market based on deposits. As of June 30, 2023, the bank had approximately \$867.1 billion in deposits in the New York CSA, of which approximately \$375.3 billion represent retail branch deposits, accounting for 26.6 percent of the bank's total deposits. As of December 31, 2023, the bank operated 750 branches and 2,870 deposit taking ATMs in the area, representing 15.4 percent of total branches and 18.3 percent of total ATMs. The bank originated and purchased approximately \$99.2 billion in loans, or 15.7 percent of total bank loan originations and purchases within bank AAs, in the New York CSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 180 FDIC-insured institutions operating 5,098 branches in the AA. JPMCB was first in deposit market share with 31.8 percent. Primary competitors included Goldman Sachs Bank USA with 8.5 percent deposit market share, Bank of America, N.A with 7.4 percent, and The Bank of New York Mellon with 7.1 percent.

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.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the New York CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: New York CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5,207	11.4	20.9	33.3	32.5	1.9
Population by Geography	22,277,037	11.6	21.8	32.4	34.0	0.2
Housing Units by Geography	8,768,565	11.0	21.1	32.4	35.4	0.1
Owner-Occupied Units by Geography	4,226,355	3.2	13.6	37.5	45.7	0.1
Occupied Rental Units by Geography	3,734,140	19.6	29.3	26.5	24.5	0.2
Vacant Units by Geography	808,070	12.2	22.8	32.1	32.7	0.2
Businesses by Geography	2,870,419	7.9	17.1	30.3	43.7	1.0
Farms by Geography	40,869	4.9	15.1	34.5	45.3	0.2
Family Distribution by Income Level	5,274,459	24.9	15.6	17.4	42.1	0.0
Household Distribution by Income Level	7,960,495	27.0	14.3	15.9	42.7	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$445,653
Median Family Income MSA - 28740 Kingston, NY MSA		\$74,546	Median Gross Rent			\$1,323
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Families Below Poverty Level			10.9%
Median Family Income MSA - 35084 Newark, NJ-PA MD		\$90,570				
Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ MD		\$95,564				
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		\$67,560				
Median Family Income MSA - 39100 Poughkeepsie- Newburgh-Middletown, NY MSA		\$85,780				
Median Family Income MSA - 45940 Trenton-Princeton, NJ MSA		\$94,908				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: New York CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5,662	10.5	21.0	33.6	31.3	3.6
Population by Geography	23,170,601	11.3	21.7	33.3	32.9	0.9
Housing Units by Geography	8,955,494	10.6	20.8	33.4	34.4	0.8
Owner-Occupied Units by Geography	4,356,707	3.2	14.5	38.4	43.5	0.4
Occupied Rental Units by Geography	3,805,998	19.3	28.0	27.5	24.0	1.2
Vacant Units by Geography	792,789	9.5	21.0	33.8	34.6	1.2
Businesses by Geography	3,847,417	8.5	17.4	30.7	41.3	2.1
Farms by Geography	50,777	5.5	15.8	35.4	42.5	0.8
Family Distribution by Income Level	5,365,077	24.3	15.9	18.1	41.8	0.0
Household Distribution by Income Level	8,162,705	27.0	14.4	15.8	42.8	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$120,156	Median Housing Value			\$525,291
Median Family Income MSA - 28740 Kingston, NY MSA		\$87,034	Median Gross Rent			\$1,546
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$130,301	Families Below Poverty Level			9.0%
Median Family Income MSA - 35084 Newark, NJ-PA MD		\$107,333				
Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ MD		\$113,495				
Median Family Income MSA - 35300 New Haven-Milford, CT MSA MD		\$92,508				
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$85,483				
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$100,123				
Median Family Income MSA - 45940 Trenton-Princeton, NJ MSA		\$108,756				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the New York CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the New York CSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the New York CSA would be \$2,392 using 2015 ACS data and \$2,820 using

2020 Census data. Depending on what portion of the CSA they resided in, low-income borrowers would be challenged to afford a mortgage payment ranging from \$845 to \$1,352 according to 2015 ACS data and \$1,069 to \$1,629 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,351 to \$2,164 according to 2015 ACS data and \$1,710 to \$2,606 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the Federal Housing Finance Authority (FHFA) House Price Index (HPI), home prices increased by 32.8 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns in the New York CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the New York CSA, 10.9 percent of families had incomes below the Federal Poverty Level (FPL) according to the 2015 ACS and 9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, as of December 2023 the non-seasonally adjusted unemployment rate for the New York CSA was 4.4 percent compared to 4.4 percent for the state of New York, 4.5 percent for the state of New Jersey, 4 percent for the state of Connecticut, and 3.5 percent nationally.

Economic Data

Bridgeport MSA

The Bridgeport MSA's economy struggled to gain momentum, lagging both the national and regional averages. Key sectors like financial services did not expand as expected due to economic uncertainty, although leisure and hospitality sectors were seeing job growth, mostly in lower wage positions. The unemployment rate was stable, but housing prices were dropping to align with national trends. Demographic trends were also problematic, with persistent out-migration from Fairfield County dampening long-term economic potential. Proximity to New York City and Boston continues to drain young talent, affecting productivity.

Kingston MSA

The Kingston MSA's economic recovery stalled, lagging both New York State and national averages in regaining pre-pandemic employment levels. The public sector and consumer services saw job losses, while healthcare employment grew but remained below state and national standards. The unemployment rate slightly increased, reflecting a growing labor force. Single-family home price appreciation in the MSA slowed faster than the state or national averages. The area's leisure and hospitality sector benefitted from its proximity to New York City and location in the Catskill Mountains. The MSA's healthcare sector faced challenges but has slowly recovered. Despite high demand due to an aging population, there was a competitive market for healthcare workers. Shrinking working-age population and a lack of high-wage industries presented challenges.

Nassau County-Suffolk County, NY (Nassau County) MD

The Nassau County MD struggled to maintain economic stability, with payrolls showing significant fluctuations. Although consumer industries rebounded, weekday activity started to shift back to New York City. Healthcare remained a critical sector, driven by a wealthier and older population and bolstered by significant investments by the leading healthcare employer. Out-migration of working-age residents exacerbated worker shortages, partially offset by the stability in healthcare. Higher mortgage rates and sustained population losses led to a decline in housing prices and sales. The MD had one of the highest costs of living in the Northeast, and high living costs continued to drive residents away. Business costs were less severe but were overshadowed by the high cost of living for commuters.

Newark, NJ-PA (Newark) MD

The Newark MD portion of the rating area had an economy that was steadily improving dependent on industry. Healthcare was the primary growth driver while other industries, such as finance and logistics, struggle to add to payrolls. Out-migration by young working adults looking for urban amenities and retiring residents who are relocating to lower cost states was dragging on the area's economy. The area's strengths include an abundance of high-value-added industries, including financial services, pharmaceuticals, and technology, a coastal location that allowed it to benefit from trade, and a well-educated and productive workforce. Weaknesses included weak population growth, high business and living costs, and an unfavorable age structure.

New Haven MSA

The New Haven MSA's economy rebounded after a period of stagnation, outperforming the U.S. The recovery was largely driven by strong performance in education and healthcare, as well as a supportive leisure and hospitality sector. While the unemployment rate was slightly higher than the Northeast average, it reflected a growing labor force participation rate. Housing prices, which previously outpaced national trends, declined to match the broader market. Yale University and the Yale New Haven Health System are key economic drivers. The area's small but growing high-tech sector benefitted from Yale's presence, especially in biotech and upcoming quantum computing research. Persistent population losses were concerns. Out-migration resumed post-pandemic, which, combined with limited high-wage job opportunities, hinder productivity gains and affect consumer and housing markets.

New York-Jersey City-White Plains, NY-NJ (New York) MD

The economic momentum for the New York MD slowed. Payroll growth moderated, though gains consumer industries and construction continued. Tourism and weekend visitors bolstered consumer sectors, but Manhattan's daytime population remained below pre-pandemic levels. The housing market cooled, with apartment rent growth decelerating. The tech and finance sectors have experienced significant layoffs, impacting office employment growth. Major tech firms have downsized with layoffs affecting real estate. Permanent shifts to hybrid and remote work have impacted commercial real estate, with office occupancy at about half of pre-pandemic levels. High interest rates and weak earnings impacted the finance sector resulting in declines in bonuses and further job losses. The return of visitors boosted consumer industry payrolls, with hotel occupancy and room rates nearing pre-pandemic levels. Out-migration created labor shortages in tourism-related low-wage jobs.

Poughkeepsie MSA

The Poughkeepsie MSA experienced varied demographic and economic conditions during the evaluation period. The labor market gradually recovered from the COVID-19 pandemic's initial impact, with employment levels improving across several sectors, including healthcare, education, and technology. However, certain industries, such as hospitality and retail, struggled to regain pre-pandemic momentum due to shifts in consumer behavior and ongoing public health concerns. The area's population showed modest growth, influenced by migration patterns and the broader impacts of the pandemic. The housing market saw increased demand, driving up home prices and rents, as urban dwellers sought more space and affordability outside of metropolitan areas like New York City.

Trenton MSA

The Trenton MSA's economy rebounded. The area lagged other New Jersey regions in performance but saw job growth in professional and business services, education, and healthcare. The unemployment rate was nearing pre-pandemic lows despite a growing labor force. Housing starts have fallen due to weakened homebuyer demand. The financial services sector continued to struggle. Stock prices declined resulting in reduced profits and bonuses. The public sector recovered from pandemic-related losses and continue to grow due to steady demand and a low uninsured rate.

Community Contacts

Examiners reviewed seven community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on areas such as affordable housing, small business, economic development, and community and social services. Contacts noted the need for both affordable rental and owner-occupied housing. A lack of affordable inventory, high taxes, and high utility costs prevent low- and moderate-income families, as well as many lower-middle-income families, from purchasing a home. Contacts noted that many lower middle-class households struggle to meet day-to-day living expenses and live paycheck to paycheck. Despite the difficulties they endure, these household earn too much money to qualify for state and federal subsidy programs. Many small businesses suffered during the pandemic. Contacts also noted the need for greater support for small businesses. Contacts identified the following AA needs:

- Technical assistance and financial education for small businesses
- Affordable rental and homeownership opportunities
- Affordable loans for first time homebuyers
- More efficient and less cumbersome grant making process from financial institutions
- Funding to help improve existing housing stock
- Support for funding for renewable energy

The area is served by numerous nonprofit organizations, community-based organizations, Community Development Financial Institutions (CDFI), loans funds, economic development organizations, and CD organizations that provide opportunities to help meet community needs.

Scope of Evaluation in New York CSA

The New York CSA represents the bank's most significant market and rating area in terms of lending, deposits, and branch distribution. The New York CSA received a full-scope review. The performance in

the NY CSA was weighed most heavily in determining the bank's overall CRA rating. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK CSA

LENDING TEST

The bank's performance under the Lending Test in the New York CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
New York CSA	123,347	747,630	2,407	1,621	875,005	100	100
Totals	123,347	747,630	2,407	1,621	875,005	100	100

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
New York CSA	75,299,452	19,143,266	32,841	4,690,433	99,165,992	100	100
Totals	75,299,452	19,143,266	32,841	4,690,433	99,165,992	100	100

Lending levels reflected good responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 31.8 percent. The bank ranked first among 180 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 4.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 944 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were Rocket Mortgage (5.1 percent), Citizen's Bank (4.4 percent), and Wells Fargo Bank (4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 24.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 342 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (33.7 percent), Bank of America (7.3 percent), and Capital One (5.7 percent).

In overall small loans to farms for 2022, the bank had a market share of 53.7 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 29 small farm

lenders in the AA. The other top lenders were U.S. Bank (11.5 percent), Bank of America (8.9 percent), and Capital One (7.6 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies approximated both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to businesses in both low-income geographies.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 1,621 CD loans totaling \$4.7 billion, which represented 12.1 percent of the allocated tier 1 capital. By dollar volume, 77.2 percent of these loans funded affordable housing, 16.8 percent funded revitalization and stabilization efforts, 5.8 percent funded community services, and 0.2 percent funded economic development targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 687 PPP loans totaling \$632.9 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$17.9 million loan to support a 132-unit affordable housing project that included 131 units set aside for low- and moderate-income households. This loan was part of the bank's Preservation Program, which incentivizes builders and operators to maintain affordable rental units and to limit the loss of affordable housing.
- Two construction loans totaling \$2 million to support the development of a community facility in an underserved area. The facility houses a nonprofit that provides services to low-income and at-risk youth and a Federally Qualified Health Center, which provides healthcare services to low- and moderate-income households. The project will further create an additional 19 full-time jobs in the low-income geography.
- A 7.2 million construction loan to support a 10-story, affordable housing development with 67 units in a moderate-income geography. Of the 67 units, 11 are set aside for homeless veterans.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 140,049 loans in the amount of \$18.7 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	6,619	1,822,877
Federal Housing Administration (FHA)	469	199,097
Chase Homebuyer Grant Loans	3,398	1,137,673
Homebuyer Education Grants	3,541	1,771
Home Lending SPCP	1,325	519,576
Veteran's Administration (VA)	57	27,697
VA Purchase Closing Credit	17	8,495
Business Card SPCP	1,295	4,929
Business Banking SPCP	1,590	154,712
Small Business Administration (SBA)	951	215,195
Paycheck Protection Program (PPP)	119,437	12,644,923
Affordable Housing Preservation Program	597	1,709,110
Total	140,049	18,746,081

INVESTMENT TEST

The bank's performance under the Investment Test in the New York CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 11.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 193 grants and donations, totaling \$34.8 million to 106 organizations. Examiners considered that while qualified investment opportunities in the New York CSA were abundant, there was strong competition for these investments from other banking institutions.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
New York CSA	497	2,099,697	363	2,199,271	860	100.0	4,298,968	100.0	6	1,852
Total	497	2,099,697	363	2,199,271	860	100.0	4,298,968	100.0	6	1,852

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

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

The bank exhibited excellent responsiveness to credit and community economic development needs. The bank's investments were particularly responsive to identified CD needs for affordable housing. By

dollar volume, 97 percent of investments supported affordable housing, 1.9 percent supported revitalization and stabilization efforts, 0.8 percent funded community services to low- and moderate-income individuals, and 0.3 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made six LIHTC investments totaling \$212 million that supported 978 affordable housing units. Additionally, the bank made 20 HTC investments totaling \$190 million and 12 NMTC investments totaling \$66.3 million.

Qualified investments made during the evaluation period include:

- A \$65.9 million HTC investment to rehabilitate a housing project in a low-income geography. The complex consisted of 2,035 apartments across 40 buildings and included a community center. All units were limited to individuals earning at or below 50 percent of AMI. The rehabilitation included improvements focused on energy efficiency, reducing overall carbon emissions. The project also includes a fully renovated senior center and daycare.
- A \$10 million investment in a minority depository institution (MDI) and CDFI based in the bank's AA. This MDI provided access to capital and competitively priced banking solutions for low- and moderate-income individuals. The bank's investments were a part of the firm's initiatives to help meet the credit needs of the MDI's local community.
- A \$600,000 grant to a nonprofit organization to support affordable rental housing for individuals recently released from prison. This population was usually sent to New York City homeless shelters and were isolated from permanent housing and social services, which contributed to the city's homelessness crisis.

SERVICE TEST

The bank's performance under the Service Test in the New York CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the New York CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
New York CSA	100.0	750	100.0	6.9	16.0	28.1	47.5	1.5	11.3	21.7	33.3	32.9	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was below and, in moderate-income geographies was near to, the percentage of the population living within those geographies. Within the AA, examiners further considered 149 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 93 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the New York CSA included 60 Community Branches, of which 20 were in low-income geographies and 23 were in moderate-income geographies. The bank also had 14 Community Center Branches in middle-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS, including ATMs, telephone banking, online banking, and mobile banking options. The bank had 2,870 deposit-taking ATMs in the AA, of which 9.5 percent were in low-income geographies and 18.7 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. During the evaluation period, the bank waived standard, out-of-network ATM fees for individuals enrolled in a states' Electronic Benefits Transfer (EBT) program. In the New York CSA, JPMCB waived approximately \$13 million in ATM fees for New York EBT transactions covering approximately 3.9 million transactions. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
New York CSA	21	102	1	-7	-32	-41	-2
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 21 branches, of which one was in a low-income geography and three were in moderate-income geographies. The bank closed 102 branches, of which none were in low-income geographies and 10 were in moderate-income geographies. One branch closure in a moderate-income geography was due to reduced customer usage. The remaining moderate-income branch closures resulted from proximity to other JPMCB locations. Despite the closures, retail delivery systems in low- and moderate-income geographies remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 4:00 p.m. or 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. A limited number of branches offer Sunday hours, often from 10:00 a.m. to 2:00 p.m. There were 235 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the New York CSA.

The level of CD services in the New York CSA was excellent. Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 30,300 qualified CD service activities to 696 organizations, for a total of 86,800 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 191 bank employees spending over 16,300 hours participating on boards and committees for 156 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial education training, pre-purchase homebuyer education, credit counseling, and legal pro bono services.

Service activities during the evaluation period include:

- The bank partnered with several CCAs to provide 2,945 financial education trainings that reached 47,658 low- and moderate-income individuals. In partnership with a nonprofit organization that supports New York City Housing Authority, the bank supported residents with financial education about savings, budgeting, credit, affordable banking products, and pathways to homeownership.
- The bank partnered with 11 nonprofit organizations that serve low- and moderate-income individuals and provided homebuyer education webinars to 3,135 individuals. The trainings explain the mortgage process, products, services, and programs available for low- and moderate-income individuals, and lender decision making process.
- A bank employee served as the Board Chair of a nonprofit mortgage coalition. The coalition consists of nonprofit organizations and lending institutions working together to create, protect, and preserve affordable homeownership for low- and moderate-income families living within the greater New York City area.

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

CRA rating for the Chicago CSA²: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Chicago CSA

The Chicago CSA was comprised of a majority of the Chicago-Naperville-Elgin, IL-IN-WI (Chicago) MSA and the entire Michigan City-La Porte, IN (Michigan City) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Chicago CSA is JPMCB's fourth largest retail market based on deposits. As of June 30, 2023, the bank had approximately \$127.9 billion of deposits in the Chicago CSA, of which approximately \$118.4 billion represented retail branch deposits, accounting for 8.4 percent of the bank's total deposits. As of December 31, 2023, the bank operated 278 branches and 1,169 deposit-taking ATMs in the area, representing 5.7 percent of total branches and 7.5 percent of total ATMs. The bank originated and purchased approximately \$41.5 billion in loans, or 6.6 percent of total bank loan originations and purchases, in the Chicago CSA during the evaluation period.

According to FDIC Deposit Market Share Data as of June 30, 2023, there were 152 FDIC-insured institutions operating 2,192 branches in the AA. JPMCB was first in deposit market share with 22.3 percent. Primary competitors included BMO Harris Bank, N.A. with 16.6 percent deposit market share, Bank of America with 8.8 percent, and CIBC Bank USA with 6.6 percent.

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

The following tables provide a summary of the demographics, including housing and business information, for the Chicago CSA for the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census analysis periods.

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago CSA 2020-2021						
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	838,867	6.1	16.9	29.6	47.0	0.4
Farms by Geography	14,041	3.6	15.0	39.7	41.6	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 MD		\$75,024	Median Housing Value			\$235,559
Median Family Income MSA - 20994 Elgin, IL MD		\$80,899	Median Gross Rent			\$1,032
Median Family Income MSA - 23844 Gary, IN MD		\$64,075	Families Below Poverty Level			10.6%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$87,137				
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA		\$58,424				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,354	11.6	22.9	32.5	31.3	1.6
Population by Geography	9,684,171	8.7	22.4	35.1	33.2	0.7
Housing Units by Geography	3,885,510	9.2	22.0	35.0	33.2	0.6
Owner-Occupied Units by Geography	2,316,384	4.5	18.2	38.2	38.8	0.3
Occupied Rental Units by Geography	1,256,801	15.5	28.1	30.7	24.7	1.0
Vacant Units by Geography	312,325	19.3	26.1	27.8	25.8	1.1
Businesses by Geography	1,189,981	6.0	17.1	32.4	43.9	0.6
Farms by Geography	18,483	4.1	17.1	40.3	38.1	0.4

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	2,303,685	22.9	16.8	19.4	40.9	0.0
Household Distribution by Income Level	3,573,185	25.3	15.4	17.0	42.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL MD		\$92,622	Median Housing Value			\$270,903
Median Family Income MSA - 20994 Elgin, IL MD		\$97,326	Median Gross Rent			\$1,208
Median Family Income MSA - 23844 Gary, IN MD		\$75,625	Families Below Poverty Level			8.2%
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$105,876				
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA		\$70,726				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Chicago CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Chicago CSA, low- and some moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Chicago CSA would be \$1,265 using 2015 ACS data and \$1,454 using 2020 Census data. Depending on what portion of the CSA they resided in, low-income borrowers would be challenged to afford a mortgage payment ranging from \$730 to \$1,089 according to 2015 ACS data and from \$884 to \$1,323 according to 2020 Census data. Some moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,168 to \$1,743 according to 2015 ACS data and ranging from \$1,415 to \$2,118 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 32.8 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Chicago MD. Increases ranged from 35.8 percent to 53.6 percent for other components of the Chicago CSA. This acceleration in home prices worsened existing affordability concerns in the Chicago CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Chicago CSA, 10.6 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Chicago CSA was 4.1 percent compared to 4.2 percent for the state of Illinois, 2.9 percent and 2.7 percent for the states of Indiana and Wisconsin, respectively, and 3.5 percent nationally.

Economic Data

Chicago-Naperville-Evanston, IL (Chicago) MD

The Chicago MD's economy was strong, with job growth exceeding the Midwest and U.S. averages. Growth in healthcare and goods-producing sectors balanced slower growth in professional/business services, transportation/warehousing, and leisure/hospitality. The labor market showed signs of strain, with a rising unemployment rate, reduced temporary employment, and a shorter average workweek. Increased domestic and international visitors improved the leisure and hospitality sectors. Home prices rose less sharply locally with economic fundamentals supporting current price levels. High housing affordability was offset by declining population and weak employment and income growth.

Elgin, IL (Elgin) MD

The Elgin MD's economy was stable and not growing rapidly. Nonfarm payrolls remained mostly flat. Manufacturing saw significant job growth. Financial services were lagging, with payrolls dropping below pre-pandemic levels. The unemployment rate increased slightly and remained higher than pre-pandemic levels, despite a gradual rise in the labor force. Manufacturing was a key driver of the Elgin MD's economy. Factories were operating at full capacity but were constrained by labor and supply chain issues. The leisure/hospitality sector was performing well. Consumer spending was constrained by high inflation, rising interest rates, and volatile equity markets.

Gary, IN (Gary) MD

The Gary MD's recent performance showed little growth, with the recovery in nonfarm payrolls lagging behind state and national averages. Its key manufacturing and consumer services sectors stagnated, though health services expanded, and logistics showed some growth. The unemployment rate rose slightly, while the labor force remained more depressed than the average. Housing price appreciation slowed, staying below the state average. Much of the MD's employment is tied to metal producers, especially steel, which struggled due to falling steel prices. Logistics growth remained slow. While e-commerce boosted national logistics growth, Gary's logistics industry remained focused on industrial cargo. Fuel prices and driver shortages continued to increase costs and wages. Gary's economy struggled due to ongoing population loss, with deaths outpacing births and shrinking the working-age population. Poor educational attainment and a shrinking labor force discouraged companies from relocating to Gary despite its low business costs.

Lake County-Kenosha County, IL-WI (Lake County-Kenosha County) MD

The Lake County-Kenosha County MD's economy was nearing a full recovery from the pandemic. Employment gains slowed. The growth in the healthcare and manufacturing sectors offset declines in professional and business services, finance, and transportation and warehousing. The labor force expanded, leading to upward pressure on the unemployment rate. The housing market remained subdued with stable single-family home prices and reduced residential investment. Biomedicine was a strength for the area, with a high concentration of pharmaceutical and medical device manufacturing jobs. The

sector's high-wage, location-specific jobs offered some protection against remote work trends. Despite sharp increases in home prices, they were less overvalued locally than nationally. Residential construction remained weak, with high housing affordability but declining population and limited household formation.

Michigan City MSA

The Michigan City MSA's economy struggled to grow. Manufacturing stabilized but did not contribute significantly to growth. The healthcare sector showed improvement, but leisure and hospitality declined. The unemployment rate rose along with the labor force, and the housing market cooled, with house prices starting to fall due to high mortgage rates. The tourism industry faced challenges with decreased gaming activity and lower visitation to the area's National Park. Increased living costs and competition from other lakeside areas also affected tourism. Manufacturing struggled due to a decline in industry employment. Population growth was slower than the Midwest average due to accelerated out-migration. The area lacked dynamic drivers to attract new residents but benefited from remote work trends that attracted people from higher-cost areas.

Community Contacts

Examiners reviewed seven community contacts completed during the evaluation period with organizations serving the area. These organizations focused on areas such as affordable housing, small business and economic development, financial literacy, and community revitalization and stabilization. Contacts noted that poverty had been increasing in the suburban areas around Chicago and the population was declining. Contacts noted that during the height of the pandemic many people working in low-wage service industry jobs became unemployed and were unable to access COVID-19 relief funds due to concerns regarding their immigration status. While housing in Chicago was relatively affordable compared to other major cities, many low-wage households faced challenges accessing affordable housing. This was particularly prevalent during the pandemic. Credit and CD needs identified include:

- Small business loan funds
- Affordable housing creation (single family and multi-family units)
- Deposit and lending products for the underserved
- Business expertise guidance
- Majority low- and moderate-income neighborhood business guidance
- Workforce development

Opportunities for participation by financial institutions included lending and investment in economic development and workforce development, supporting CD services such as financial literacy, and various state and local government partnership opportunities.

Scope of Evaluation in Chicago CSA

The Chicago CSA represents fourth largest rating area by deposits. The Chicago CSA received a full-scope review. Refer to the table in appendix A for more information.

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 Outstanding. Based on a full-scope review, the bank's performance in the Chicago CSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Chicago CSA	98,330	265,177	1,215	518	365,240	100.0	100.0
Totals	98,330	265,177	1,215	518	365,240	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Chicago CSA	33,773,040	5,267,877	15,697	2,484,141	41,540,755	100.0	100.0
Totals	33,773,040	5,267,877	15,697	2,484,141	41,540,755	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 22.3 percent. The bank ranked first among 152 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 4.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked second among 958 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were Guaranteed Rate (6.7 percent), Rocket Mortgage (4.2 percent), and United Wholesale Mortgage (3.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 28.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 247 small business lenders in the AA. The other top lenders were American Express (21.4 percent), Bank of America (6.9 percent), and Citibank (6.7 percent).

In overall small loans to farms for 2022, the bank had a market share of 28.1 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 47 small farm lenders in the AA. The other top lenders were John Deere Financial (19.5 percent), U.S. Bank (8.5 percent), and Old National Bank (5.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the Chicago CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was near to the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Chicago CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 518 CD loans totaling almost \$2.5 billion, which represented 20.3 percent of the allocated tier 1 capital. By dollar volume, 63.7 percent of these loans funded community services targeted to low- and moderate-income individuals, 23.6 percent funded affordable housing that supported 8,052 units, 12.6 percent funded revitalization and stabilization efforts, and less than 1 percent funded economic development activities. Of the total CD loans, the bank made 197 PPP loans totaling \$146.2 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

- A \$85.5 million construction loan for an affordable housing development in an upper-income geography in downtown Chicago. The 24-story building, that formerly housed a local chapter of an international youth organization, will be converted to 406 larger studio apartments for low-income families.
- Four loans totaling over \$13.8 million to a gang intervention, violence prevention, and youth development organization based in Chicago. The financing supports the renovation and expansion of the organization's facility located in a moderate-income geography. The organization provides local youth with college and career preparation, entrepreneurship, technology, and mental health programing.
- Three loans totaling over \$152.3 million to a local school district to refinance several general obligation limited school bonds. Per the National Center for Education Statistics (NCES), more than 60.6 percent of the students in the district are eligible for the Federal Free or Reduced Lunch program.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 51,738 loans in the amount of \$5.7 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	5,964	1,067,308
Federal Housing Administration (FHA)	715	169,178
Chase Homebuyer Grant Loans	2,078	453,306
Homebuyer Education Grants	3,198	1,599
Home Lending SPCP	1,513	340,142
Community Lending Program (Correspondent SPCP)	607	145,169
Veteran's Administration (VA)	132	42,711
VA Purchase Closing Credit	53	18,410
Business Card SPCP	478	2,066
Business Banking SPCP	260	22,466
Small Business Administration (SBA)	359	90,348
Paycheck Protection Program (PPP)	36,174	3,062,690
Affordable Housing Preservation Program	207	302,005
Total	51,738	5,717,398

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 was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.2 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 170 grants and donations, totaling \$49.6 million to 92 organizations. Examiners considered that while qualified investment opportunities in the Chicago CSA were abundant, there was strong competition for these investments from other banking institutions.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Chicago CSA	136	220,888	301	903,243	437	100.0	1,124,131	100.0	0	0
Total	136	220,888	301	903,243	437	100.0	1,124,131	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. By dollar volume, 57.2 percent of investments supported affordable housing, 38 percent funded community services to low- and moderate-income individuals, 4.3 percent supported revitalization and stabilization efforts, and 0.5 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 19 LIHTC investments totaling \$268.3 million that supported 2,773 affordable housing units. Additionally, the bank made 12 NMTC investments totaling \$45.3 million.

Qualified investments made during the evaluation period include:

- A \$95 million LIHTC investment for a 485-unit development for seniors aged 62 or older. The project consisted of the rehabilitation of an existing public housing property and the construction of a new multifamily building. This complex transaction was responsive to Chicago's shortage of affordable housing and included on-site services provided by a local charity organization.
- A \$6.5 million NMTC equity investment to a nationally respected gang intervention, violence prevention, and youth development organization that serves at-risk low- and moderate-income youths. Funds were used to renovate the existing building, allowing the organization to expand and enhance their programming to serve a larger number of participants.
- Over \$1.8 million in grants to a leading regional health care system based in the AA. The funds supported initiatives aimed at improving the health and economic vitality of neighborhoods where the majority of the population were low- and moderate-income individuals and families. The initiative also supported local entrepreneurs and procurement opportunities at anchor institutions to grow and create local jobs.

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 was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Chicago CSA	100.0	278	100.0	5.0	18.0	32.7	43.9	0.4	8.7	22.4	35.1	33.2	0.7
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was below and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 75 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 35 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Chicago CSA included 16 Community Branches, of which three were in low-income geographies and 10 in moderate-income geographies. The bank also had a Community Center Branch located in a middle-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS, including ATMs, telephone banking, online banking, and mobile banking options. The bank had 1,169 deposit-taking ATMs in the AA, of which 4.9 percent were in low-income geographies and 19.1 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Chicago CSA	3	47	0	-5	-12	-27	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 three branches, of which two were in moderate-income geographies. The bank closed 47 branches, of which seven were in moderate-income geographies. One branch closure in a moderate-income geography was due to safety and security issues. The remaining branch closures resulted from reduced customer usage, proximity to other JPMCB locations, or the need to optimize market efficiency and improve customer experience. Despite the closures, retail delivery systems in low- and moderate-income geographies remained readily accessible.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 4:30 p.m. or 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were 160 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Chicago CSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 15,115 qualified CD service activities to 288 organizations, for a total of 39,928 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 66 bank employees spending 4,817 hours participating on boards and committees for 56 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial training and credit counseling.

Service activities during the evaluation period include:

- The bank partnered with various legal aid organizations to provide 2,437 hours of legal assistance services to 1,274 individuals in low- and moderate-income communities. These clinics offered an array of legal pro bono and other community service activities focused on strengthening communities, empowering families and advocating for vulnerable individuals.
- A bank employee provided 510 hours serving on the board of an organization that provided medical care, workforce development, behavior health support, and housing services to ill or injured homeless adults.
- The bank provided homebuyer education trainings, totaling 8,160 hours to 3,198 individuals. The topics covered included mortgage process, products, services, and programs available for low- and moderate-income individuals, and lender decision making process.

Portland-Vancouver-Salem, OR-WA CSA (Portland CSA)

CRA rating for the Portland CSA³: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Portland CSA

The Portland CSA was comprised of the entire Albany-Lebanon, OR (Albany) MSA; Corvallis, OR (Corvallis) MSA; Salem, OR (Salem) MSA; and Longview, WA (Longview) MSA and a majority of the Portland-Vancouver-Hillsboro, OR-WA (Portland) CSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Portland CSA is JPMCB's 14th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$12.5 billion in deposits in the Portland CSA, of which approximately \$12.2 billion represent retail branch deposits, accounting for 0.9 percent of the bank's total deposits. As of December 31, 2023, the bank operated 72 branches and 149 deposit taking ATMs in the area, representing 1.5 percent of total branches and 1 percent of total ATMs. The bank originated and purchased approximately \$8 billion in loans, or 1.3 percent of total bank loan originations and purchases, in the Portland CSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 32 FDIC-insured institutions operating 496 branches in the AA. JPMCB ranked third in deposit market share with 16 percent. Primary competitors included U.S. Bank with 21.8 percent deposit market share, Bank of America with 18.1 percent, and Wells Fargo Bank with 14.5 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics,

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

including housing and business information, for the Portland CSA for each evaluation period.

Table A – Demographic Information of the Assessment Area Assessment Area: Portland CSA 2020-2021						
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	372,477	3.1	22.0	41.3	31.9	1.7
Farms by Geography	12,826	1.8	14.3	55.1	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				
Source: 2015 ACS and 2021 D&B Data, Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Portland CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	724	2.6	22.1	47.1	27.3	0.8
Population by Geography	3,268,700	2.5	22.2	48.7	26.3	0.3
Housing Units by Geography	1,296,533	2.5	22.1	48.6	26.5	0.3
Owner-Occupied Units by Geography	766,715	1.2	17.4	50.8	30.4	0.1
Occupied Rental Units by Geography	464,291	4.5	29.9	44.7	20.2	0.7
Vacant Units by Geography	65,527	2.8	21.6	50.1	25.0	0.5
Businesses by Geography	494,874	1.8	20.7	45.0	31.7	0.7

Table A – Demographic Information of the Assessment Area Assessment Area: Portland CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	16,587	1.3	14.3	56.2	28.0	0.3
Family Distribution by Income Level	786,432	20.2	18.3	21.3	40.2	0.0
Household Distribution by Income Level	1,231,006	23.2	16.7	18.6	41.6	0.0
Median Family Income MSA - 10540 Albany-Lebanon, OR MSA		\$68,860	Median Housing Value			\$379,968
Median Family Income MSA - 18700 Corvallis, OR MSA		\$89,816	Median Gross Rent			\$1,282
Median Family Income MSA - 31020 Longview, WA MSA		\$72,234	Families Below Poverty Level			6.9%
Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$94,727				
Median Family Income MSA - 41420 Salem, OR MSA		\$73,679				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Portland CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Portland CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Portland CSA would be \$1,418 using 2015 ACS data and \$2,040 using 2020 Census data. Depending on what portion of the CSA they reside in, low-income borrowers would be challenged to afford a mortgage payment ranging from \$684 to \$962 according to 2015 ACS data and from \$861 to \$1,184 according to 2020 Census data. Many moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,094 to \$1,539 according to 2015 ACS data and ranging from \$1,377 to \$1,895 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 31.3 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Portland MSA. Increases ranged from 40.2 percent to 44.5 percent for other components of the Portland CSA. This acceleration in home prices worsened existing affordability concerns in the Portland CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Portland CSA, 10.1 percent of families had incomes below the FPL

according to the 2015 ACS and 6.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Portland CSA was 3.8 percent, compared to 3.9 percent for the state of Oregon, 4.6 percent for the state of Washington, and the national unemployment rate of 3.5 percent.

Economic Data

Albany MSA

The Albany MSA's economic growth slowed due to a slowdown in manufacturing, construction, and public sector job creation. Consumer services, healthcare, and transportation and utilities significantly outperformed both Oregon and U.S. averages. The labor force expanded at one of the highest rates in the country. After years of rapid growth, the housing market cooled, with single-family house price appreciation and construction slowing sharply. Manufacturing showed signs of recovery after being hit hard by global commodity price increases and supply chain disruptions in 2020 and 2021. The region appealed to retirees, due to its relatively low living costs.

Corvallis MSA

The Corvallis MSA's economic performance remained sluggish, trailing behind the state and national averages. Public sector payrolls, still below pre-pandemic levels, held back overall growth. The unemployment rate remained higher than pre-pandemic levels, partially due to a surging labor force. Single-family house price appreciation outpaced the state, but permitting activity lagged behind both Oregon and U.S. averages. Growth in state government employment remained limited. The area's high quality of life attracted new residents. Incomes in the area remained below state and national averages, largely due to the high number of students from the local university. The shrinking importance of high-tech employment posed a challenge for the area, as it had been a key source of high-wage jobs. The area has benefited from below-average business costs and the presence of large public university.

Longview MSA

The Longview MSA's economy accelerated during the evaluation period. Employment grew robustly, led by manufacturing and professional/business services. Healthcare and logistics shed jobs due to labor shortages, impacting these sectors more than others. Manufacturing saw above-average job growth due to sustained demand for wood and rebounding demand for paper products. The consumer economy grew steadily, supported by moderate population and income growth, despite challenges in finding workers for consumer services. The housing market strengthened moderately, supported by job growth in medium-wage industries, which bolstered incomes and housing demand.

Portland-Vancouver-Hillsboro, OR-WA (Portland) MSA

The Portland MSA's economy outperformed both state and national levels, with its labor market showing strong growth. Semiconductor manufacturing saw significant employment growth. The industry boomed post-pandemic, driven by high demand, supply shortages, and significant government and private investment. Professional and technical services saw continued, albeit slower, job growth. Portland's workforce was dominated by white-collar professionals, particularly engineers and

consultants. The housing market faced challenges. Mortgage expenses in Portland rose much faster than the national average since late 2021, and the city's housing prices, already higher than average, declined.

Salem, OR (Salem) MSA

The Salem MSA's economic recovery faced challenges, with a slight decrease in total employment even as national employment continued to grow. Significant growth in government jobs helped offset private sector declines. The public sector rebounded more quickly than most other industries. State government jobs saw steady, slow, growth, while local government employment remained weak. Elevated farm goods prices and increased agricultural exports supported continued growth. Despite climate risks, including wildfires and drought, high agricultural prices helped sustain farm incomes. The city's population grew, driven by a young working-age population. Although out-migration remained a challenge, it had slowed. The rise of remote work created opportunities, as the area's lower cost of living compared to other nearby areas made it an attractive relocation destination.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations located throughout the area. These organizations focused on affordable housing, economic mobility, and economic development/small business. Contacts identified the following needs within the community:

- Affordable rental and single-family housing
- Affordable home loans and housing tax credits
- Small business counseling
- Financial literacy education
- Economic development
- Homeless/supportive & transitional housing
- Workforce development

Opportunities for participation by financial institutions include the following:

- Affordable mortgage lending
- Investment in affordable housing
- Funding community organizations
- Lending and investment in micro and small businesses
- Supporting CD services such as financial literacy
- Working with the area's community development network
- Various state and local government partnership opportunities

Scope of Evaluation in Portland CSA

The Portland CSA received a full-scope review. Refer to the table in appendix A for more information.

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 was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Portland CSA	12,945	50,909	1,031	205	65,090	100.0	100.0
Totals	12,945	50,909	1,031	205	65,090	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Portland CSA	6,084,228	961,748	13,171	946,535	8,005,682	100.0	100.0
Totals	6,084,228	961,748	13,171	946,535	8,005,682	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 16 percent. The bank ranked third among 32 depository financial institutions placing it in the top 10 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 16th among 653 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Onpoint Community Credit Union (8.3 percent), United Wholesale Mortgage (4.3 percent), and U.S. Bank (4.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 73 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (22 percent), Capital One (9.3 percent), and Bank of America (6.8 percent).

In overall small loans to farms for 2022, the bank had a market share of 27.9 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 15 small farm lenders in the AA. The other top lenders were Capital One (16.4 percent), U.S. Bank (16.4 percent), and Bank of America (9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of lending in low-income geographies.

Small Loans to Farms

Refer to Table S in the Portland CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Portland CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 205 CD loans totaling \$946.5 million, which represented 75 percent of the allocated tier 1 capital. By dollar volume, 98.6 percent of these loans funded affordable housing that supported over 7,743 units, 1.4 percent funded revitalization and stabilization efforts, and less than 0.1 percent funded economic development. Of the total CD loans, the bank made 25 PPP loans totaling \$12.3 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

- A \$14.3 million loan for a new multifamily development with 100 units, of which 94 were restricted to families or individuals earning 60 percent or less of the AMI and five units reserved for those earning 80 percent or less of the AMI. Additionally, 25 units were designated for households experiencing homelessness or at risk of homelessness.
- A \$65 million tax-exempt construction bond loan to a local housing authority to rehabilitate five multi-family buildings. The project consists of 260 units targeted to households earning 50 percent to 80 percent of the AMI. Of these units, 223 will receive rental subsidies through Project-Based Rental Assistance contracts with HUD.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 5,558 loans in the amount of \$812.6 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	272	67,913
Federal Housing Administration (FHA)	33	11,686
Chase Homebuyer Grant Loans	238	81,315
Homebuyer Education Grants	88	44

Loan Type	Number of Loans	Dollar Amount (\$000s)
Community Lending Program (SPCP)	5	1,563
Veteran's Administration (VA)	28	12,535
VA Purchase Closing Credit	6	2,870
Business Card SPCP	5	29
Business Banking SPCP	4	330
Small Business Administration (SBA)	73	24,004
Paycheck Protection Program (PPP)	4,696	373,434
Affordable Housing Preservation Program	110	236,918
Total	5,558	812,641

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 was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 27.5 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 14 grants and donations, totaling \$1.7 million to nine organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Portland CSA	28	24,839	41	321,896	69	100.0	346,735	100.0	0	0
Total	28	24,839	41	321,896	69	100.0	346,735	100.0	0	0
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 98.4 percent of investments supported affordable housing, 1.1 percent supported revitalization and stabilization efforts, and 0.5 percent funded community services to low- and moderate-income individuals.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 25 LIHTC investments totaling \$296.7 million that supported 2,583 affordable housing units. Additionally, the bank made one NMTC investment totaling \$3.8 million.

Qualified investments made during the evaluation period include:

- A \$31.9 million LIHTC- investment to rehabilitate a nine-building, 34-unit development, and to construct an additional seven buildings that will create 83 new affordable housing units targeted to households with incomes below 60 percent of the AMI. Of the 117 units, 25 will be permanent supportive housing units catering to homeless households.
- A \$3.8 million NMTC equity investment to support the construction of a building that will be used for emergency shelter and supportive services. The nonprofit organization sponsoring the project provides support to households experiencing homelessness, addiction, or incarceration.

SERVICE TEST

The bank's performance under the Service Test in the Portland CSA is rated Outstanding. Based on a full-scope review, the bank's performance in Portland CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Portland CSA	100.0	72	100.0	1.4	23.6	50.0	25.0	0.0	2.5	22.2	48.7	26.3	0.3
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was below and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered 19 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 14 were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking option. JPMCB had 149 deposit-taking ATMs in the AA, of which 2.7 percent were in low-income geographies and 22.8 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Portland CSA	10	25	-1	-5	-8	-1	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 10 branches, of which two were in moderate-income geographies. The bank closed 25 branches, of which one was in a low-income geography and seven were in moderate-income geographies. The branch closures were the result of the bank's exit strategy for in-store branches and to optimize market efficiency or for improvement in customer experience.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. or 10:00 a.m. to 1:00 p.m. on Saturday. There were 46 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Portland CSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 2,938 qualified CD service activities to 18 organizations, for a total of 3,356 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by three bank employees spending over 36 hours participating on boards and committees for three different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial training and credit counseling.

Service activities during the evaluation period include:

- A bank employee provided 22 hours of Board service to a nonprofit CDFI that focuses on creating, preserving, and advocating for affordable housing in Oregon. The CDFI provides technical assistance, as well as pre-development, bridge, and permanent loans, to borrowers.
- The bank partnered with four CCAs to provide 18 financial literacy classes that assisted 185 individuals. Classes provided attendees with the fundamental building blocks of personal finance. Topics included savings methods, budgeting, building a credit profile, and proper use of credit.

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

CRA rating for the Louisville CSA⁴: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PORTLAND CSA

Description of Institution's Operations in Louisville CSA

The Louisville CSA was comprised of the entire Scottsburg, IN MiSA, a majority of the Louisville-Jefferson County, KY-IN (Louisville) MSA, and a portion of the Elizabethtown-Fort Knox, KY (Elizabethtown) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Louisville CSA is JPMCB's 19th largest rating area by deposits. As of June 30, 2023, the bank had approximately \$7.8 billion in deposits in the Louisville CSA, of which approximately \$6.1 billion represent retail branch deposits, accounting for 0.4 percent of the bank's total deposits. As of December 31, 2023, the bank operated 28 branches and 62 deposit taking ATMs in the area, representing 0.6 percent of total branches and 0.4 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, in the Louisville CSA during the evaluation period.

According to FDIC Deposit Market Share Data as of June 30, 2023, there were 40 FDIC-insured institutions operating 334 branches in the AA. JPMCB ranked second in deposit market share with 18.5

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.

percent. Primary competitors included PNC Bank with 22.1 percent deposit market share, Stock Yards Bank and Trust Company with 10 percent, and Fifth Third Bank with 8.2 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Louisville CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Louisville CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	293	11.9	20.5	38.2	28.3	1.0
Population by Geography	1,222,759	8.6	17.3	43.1	30.7	0.4
Housing Units by Geography	531,358	9.2	18.7	42.8	28.9	0.4
Owner-Occupied Units by Geography	313,040	4.1	13.9	45.5	36.4	0.1
Occupied Rental Units by Geography	165,473	16.2	26.1	39.0	18.0	0.8
Vacant Units by Geography	52,845	17.2	23.6	39.4	18.7	1.1
Businesses by Geography	127,492	7.2	15.0	35.8	39.0	3.1
Farms by Geography	3,742	3.3	9.2	48.4	38.5	0.7
Family Distribution by Income Level	305,964	21.1	17.5	20.0	41.4	0.0
Household Distribution by Income Level	478,513	24.6	15.8	17.7	41.9	0.0
Median Family Income MSA - 21060 Elizabethtown-Fort Knox, KY MSA		\$59,273	Median Housing Value			\$158,568
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$64,965	Median Gross Rent			\$753
Median Family Income Non-MSAs - IN		\$55,715	Families Below Poverty Level			10.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Louisville CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	9.0	24.1	38.3	26.2	2.4
Population by Geography	1,274,958	5.9	22.2	41.3	29.7	0.9
Housing Units by Geography	546,490	6.6	23.1	41.6	27.6	1.1
Owner-Occupied Units by Geography	323,301	2.9	17.9	43.7	35.1	0.4
Occupied Rental Units by Geography	171,279	11.5	31.3	38.5	16.2	2.4
Vacant Units by Geography	51,910	12.9	29.2	38.2	18.1	1.6
Businesses by Geography	167,321	5.5	18.5	38.4	36.1	1.4
Farms by Geography	4,855	2.4	14.2	43.7	39.2	0.5

Table A – Demographic Information of the Assessment Area Assessment Area: Louisville CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	309,772	20.6	18.2	20.3	40.9	0.0
Household Distribution by Income Level	494,580	23.3	16.8	18.4	41.5	0.0
Median Family Income MSA - 21060 Elizabethtown-Fort Knox, KY MSA		\$71,446	Median Housing Value			\$186,635
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA		\$77,584	Median Gross Rent			\$875
Median Family Income Non-MSAs - IN		\$67,032	Families Below Poverty Level			8.4%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Louisville CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Louisville CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Louisville CSA would be \$851 using 2015 ACS data and \$1,002 using 2020 Census data, low-income borrowers would be challenged to afford a mortgage payment ranging from \$696 to \$812 according to 2015 ACS data and from \$838 to \$970 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,114 to \$1,299 according to 2015 ACS data and ranging from \$1,341 to \$1,552 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 39.9 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Louisville MSA and by 52.9 percent in the Elizabethtown MSA. This acceleration in home prices worsened existing affordability concerns in the Louisville CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Louisville CSA, 10.8 percent of families had incomes below the FPL according to the 2015 ACS and 8.4 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Louisville MMSA was 3.3 percent compared to the state of Kentucky at 3.8 percent, the state of Ohio at 3.1 percent, and 3.5 percent nationally.

Economic Data

Elizabethtown MSA

The Elizabethtown MSA's economic recovery stagnated, due to slow public sector growth and minimal private service industry expansion. Although the unemployment rate was lower than pre-pandemic levels, it resulted from weak labor force growth. The housing market had above-average price appreciation, but new construction lagged behind both state and national trends. Manufacturing growth was slow as it is heavily reliant on auto parts suppliers. The sector was shrinking due to increased automation. The agricultural sector saw price increases, but the rising costs of essential inputs like fertilizer, fuel, and labor eroded potential profits for farmers. The federal government and military presence in the area play a crucial role in the local economy.

Louisville MSA

The Louisville MSA fully recovered the jobs lost during the pandemic, although its economic recovery was uneven across industries. White-collar sectors like professional/business services and financial services led the way, with payrolls exceeding pre-pandemic levels. Industrial production saw improvement as well, though ongoing supply chain issues delayed a full recovery in manufacturing. The logistics sector experienced rapid growth, aided by Louisville's strategic location near major transportation routes and Louisville International Airport. The pandemic accelerated e-commerce, which in turn fueled the growth of logistics. An increase in immigration and increased mobility factors have started to bring residents back leading to an increase in the area's population.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focused on community development, economic development, and small business development and support. Contacts noted that there had been increased branch closures in areas that were already underserved. These areas contained unbanked and underbanked residents who remained in a cycle of poverty. During the COVID-19 pandemic, many businesses sought access to PPP loans. Businesses that survived the pandemic were still in need of access to operating capital. Major employers experienced some downsizing during the pandemic. As the economy has recovered from the pandemic, many small businesses continue to have difficulties attracting and retaining workers. Contacts also noted that there was a need for lenders willing to provide smaller dollar mortgage loans in low-income communities. The housing values in some underserved communities were low, making it difficult to obtain reasonable appraisal values, particularly for homeowners looking to make property improvements. Contacts identified the following AA needs:

- Access to affordable housing, including affordable rental housing
- Loans for small businesses
- Smaller dollar mortgage loans
- Access to mortgage loan products with flexible underwriting standards

Scope of Evaluation in Louisville CSA

The Louisville CSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE CSA

LENDING TEST

The bank's performance under the Lending Test in the Louisville CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Louisville CSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Louisville CSA	4,631	16,060	306	25	21,022	100.0	100.0
Totals	4,631	16,060	306	25	21,022	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Louisville CSA	999,923	273,400	3,413	60,081	1,336,817	100.0	100.0
Totals	999,923	273,400	3,413	60,081	1,336,817	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 18.5 percent. The bank ranked second among 40 depository financial institutions placing it in the top 5 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 15th among 546 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were United Wholesale Mortgage (6 percent), PNC Bank (5 percent), and Republic Bank & Trust (4.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 104 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (25.2 percent), U.S. Bank (8 percent), and Capital One (6.6 percent).

In overall small loans to farms for 2022, the bank had a market share of 25.5 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 29 small farm lenders in the AA, which placed it in the top 7 percent of lenders. The other top lenders were John Deere Financial (29.7 percent), German American Bank (9.1 percent), and U.S. Bank (7.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the Louisville CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to no small loans to farms in low-income geographies and a lower distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Louisville CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test Conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 25 CD loans totaling \$60.1 million, which represented 9.4 percent of the allocated tier 1 capital. By dollar volume, 62.3 percent funded revitalization and stabilization efforts, 37.6 percent funded affordable housing, and 0.1 percent funded economic development. Of the total CD loans, the bank made 24 PPP loans totaling \$37.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period also included a \$22.6 million loan to finance the construction of a mixed-income development. Of the 210 units, 168 are restricted to individuals or families earning 60 percent or less of the AMI and 22 units are restricted to no more than 80 percent of the AMI.

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, a total of 2,317 loans in the amount of \$305.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	438	66,023
Federal Housing Administration (FHA)	69	11,491
Chase Homebuyer Grant Loans	149	23,081
Homebuyer Education Grants	235	118

Loan Type	Number of Loans	Dollar Amount (\$000s)
Home Lending SPCP	31	3,798
Community Lending Program (Correspondent SPCP)	5	830
Veteran's Administration (VA)	24	5,960
VA Purchase Closing Credit	10	2,796
Business Card SPCP	12	64
Business Banking SPCP	3	170
Small Business Administration (SBA)	9	1,030
Paycheck Protection Program (PPP)	1,332	189,980
Total	2,317	305,341

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 was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, although not often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 13.4 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 14 grants and donations, totaling \$3.4 million to nine organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Louisville CSA	23	19,143	23	66,041	46	100.0	85,184	100.0	0	0
Total	23	19,143	23	66,041	46	100.0	85,184	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 95 percent of investments supported affordable housing, 4.6 percent funded community services to low- and moderate-income individuals, and 0.4 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made eight LIHTC investments totaling \$56.7 million that supported 1,413 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$12.7 million LIHTC investment to fund an affordable housing development that included 210 new apartment units across 27 buildings. The project provides 190 units that are restricted to low- and moderate-income individuals.
- Over \$1.8 million in grants to the local chapter of a nationwide community service organization to fund a digital inclusion and economic development initiative. The initiative aims to equip residents in six of the city's lowest income neighborhoods with skills necessary to compete for jobs while also connecting them to services through a formalized referral network and a new shared data platform.

SERVICE TEST

The bank's performance under the Service Test in the Louisville CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Louisville CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Louisville CSA	100.0	28	100.0	7.1	17.9	35.7	39.3	0.0	5.9	22.2	41.3	29.7	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered seven branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which five were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Louisville CSA included two Community Branches, of which one was in a middle-income geography and one in an upper-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 62 deposit-taking ATMs in the AA, of which 12.9 percent were in low-income geographies and 19.4 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Louisville CSA	0	8	0	0	-6	-2	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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 did not open any branches, and the bank closed eight branches, none of which were in low- or moderate-income geographies. Branch closures were due to reduced customer usage and proximity to other JPMCB branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally Monday through Friday from 9:00 a.m. to 5:00 p.m. and Saturday from 9:00 a.m. to noon or 1:00pm. There were 22 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Louisville CSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 1,005 qualified CD service activities to 51 organizations, for a total of 1,744 hours. A majority of the bank's assistance was to organizations providing financial education targeted to low- and moderate-income individuals and families. The bank also provided service hours for organizations that provided access to homeownership and affordable housing. Leadership was evident by five bank employees spending over 162 hours participating on boards and committees for four different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with improving financial health for underserved populations.

Service activities during the evaluation period include:

- JPMCB employees provided 76 hours serving on the board of an economic development organization that serves as the driver for responsible commercial revitalization of a portion of the Louisville CSA. The organization collaborates with local partners to create development opportunities that will attract new businesses and create jobs.
- The bank partnered with a CCA to fostering economic empowerment in historically underserved urban communities. JPMCB sponsored financial literacy workshops attended by 112 individuals. The classes taught key concepts such as budgeting, savings methods, consumer rights, and the value of money.

Cincinnati, OH-KY-IN MMSA (Cincinnati MMSA)

CRA rating for the Cincinnati MMSA⁵: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Cincinnati MMSA

The Cincinnati MMSA was comprised of a portion of the Cincinnati, OH-KY-IN MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Cincinnati MMSA is JPMCB's 24th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$3.6 billion in deposits in the Cincinnati MMSA, of which approximately \$3.5 billion represent retail branch deposits, accounting for 0.2 percent of the bank's total deposits. As of December 31, 2023, the bank operated 34 branches and 65 deposit-taking ATMs in the area, representing 0.7 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$1.5 billion in loans, or 0.2 percent of total bank loan originations and purchases, in the Cincinnati MMSA during the evaluation period.

According to FDIC Deposit Market Share Data as of June 30, 2023, there were 50 FDIC-insured institutions operating 557 branches in the AA. JPMCB ranked sixth in deposit market share with 1.9 percent. Primary competitors include U.S. Bank with 54.6 percent deposit market share, Fifth Third Bank with 26.5 percent, and PNC Bank with 4.4 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Cincinnati MMSA for each analysis period.

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

Table A – Demographic Information of the Assessment Area Assessment Area: Cincinnati MMSA 2020-2021						
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	145,339	7.0	17.6	35.9	38.5	1.0
Farms by Geography	4,075	3.8	12.7	47.6	35.7	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, OH-KY-IN MSA		\$69,949	Median Housing Value			\$158,731
			Median Gross Rent			\$768
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Cincinnati MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	503	10.3	22.5	35.2	28.8	3.2
Population by Geography	2,070,042	7.3	21.0	37.0	33.2	1.5
Housing Units by Geography	865,006	8.2	22.7	37.1	30.5	1.6
Owner-Occupied Units by Geography	528,595	3.6	17.4	40.4	38.0	0.5
Occupied Rental Units by Geography	269,335	14.9	31.6	31.9	18.6	2.9
Vacant Units by Geography	67,076	16.9	28.5	31.3	18.8	4.5
Businesses by Geography	277,881	5.9	19.3	33.7	39.9	1.2
Farms by Geography	6,789	3.5	16.0	42.6	37.1	0.8
Family Distribution by Income Level	511,400	20.9	17.3	20.9	40.9	0.0
Household Distribution by Income Level	797,930	24.6	15.5	17.4	42.6	0.0
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA		\$84,990	Median Housing Value			\$187,414
			Median Gross Rent			\$885
			Families Below Poverty Level			7.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Cincinnati MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Cincinnati MMSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Cincinnati MMSA would be \$852 using 2015 ACS data and \$1,006 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment exceeding \$874 according to 2015 ACS data and \$1,062 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,399 according to 2015 ACS data and \$1,700 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.7 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Cincinnati MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Cincinnati MMSA, 10.3 percent of families had incomes below the FPL according to the 2015 ACS and 7.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Cincinnati MMSA was 2.9 percent compared to the Ohio unemployment rate of 3.1 percent, the Kentucky unemployment rate of 3.9, and 3.5 percent nationally.

Economic Data

The Cincinnati MSA's economy was doing well. Total employment grew steadily led by jobs in healthcare, construction, and hospitality/leisure. The area was a banking and insurance hub. The finance industry experienced some challenges as borrower delinquencies rose, fueling tighter lending standards. Demand for credit slowed because of higher borrowing costs and economic uncertainty. Unemployment increased modestly, although it was still below its pre-pandemic norm. Single-family house prices were growing closely in line with both the state and U.S. rates. Permitting and new construction remained subdued. The area had a highly educated and skilled workforce, a strong transportation network and presence of multinational firms, low living costs with affordable housing, and comparatively low business costs. The area has experienced slow population growth.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. One of the contacts included a listening session with representatives from multiple organizations. These organizations focused on affordable housing,

community development and economic development, and financial capability. Contacts noted that the city was highly segregated. There was an affordable housing crisis prior to the COVID-19 pandemic and the pandemic made things worse. Contacts identified credit and CD needs included:

- Funding for housing rehab and weatherization
- Affordable car loans
- Financial education, including use of credit cards and fintech products
- Access to traditional brick and mortar branches in low-income neighborhoods
- Small dollar mortgage products
- Affordable housing preservation

The area was being served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provided opportunities to help meet community needs. Opportunities for support included establishing long-term financial and service relationships between financial institutions and nonprofit organizations; greater engagement with communities of color; and support for wraparound services related to workforce development, including skill building, financial education, transportation, and childcare.

Scope of Evaluation in Cincinnati MMSA

The Cincinnati MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN 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 was good.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Cincinnati MMSA	4,994	19,657	215	13	24,879	100.0	100.0
Totals	4,994	19,657	215	13	24,879	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Cincinnati MMSA	1,161,568	288,610	2,208	23,803	1,476,189	100.0	100.0
Totals	1,161,568	288,610	2,208	23,803	1,476,189	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.9 percent. The bank ranked sixth among 50 depository financial institutions placing it in the top 12 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 20th among 597 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were Fifth Third Bank (8.4 percent), Union Savings Bank (5.7 percent), and The Huntington National Bank (5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 14 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 134 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (25.7 percent), U.S. Bank (15.6 percent), and Capital One (7.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 24.4 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 26 small farm lenders in the AA, which placed it in the top 8 percent of lenders. The other top lenders were U.S. Bank (32.9 percent), John Deere Financial (10.2 percent), and The Huntington National Bank (6.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. More weight was given to moderate-income geographies due to limited availability of owner-occupied housing units in low-income geographies.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than its performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

For 2022 through 2023, the bank's percentage of small loans to farms in both low- and moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of low-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Cincinnati MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 13 CD loans totaling \$23.8 million, which represented 6.6 percent of the allocated tier 1 capital. By dollar volume, 99.7 percent of these loans funded revitalization and stabilization efforts and 0.3 percent funding economic development. All CD loans were PPP loans that provided relief for organizations due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 2,133 loans in the amount of \$235 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	317	48,987
Federal Housing Administration (FHA)	38	7,244
Chase Homebuyer Grant Loans	216	38,787
Homebuyer Education Grants	174	87
Home Lending SPCP	49	10,502
Community Lending Program (Correspondent SPCP)	12	2,666
Veteran's Administration (VA)	17	4,430
VA Purchase Closing Credit	8	2,291
Business Card SPCP	7	25
Business Banking SPCP	1	30
Paycheck Protection Program (PPP)	1,294	119,984
Total	2,133	235,033

INVESTMENT TEST

The bank's performance under the Investment Test in the Cincinnati MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Cincinnati MMSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, although not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 24.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made six grants and donations, totaling \$1.3 million to six organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Cincinnati MMSA	42	28,544	31	59,859	73	100.0	88,403	100.0	0	0
Total	42	28,544	31	59,859	73	100.0	88,403	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to the credit and economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 87.7 percent of investments supported affordable housing, 10.7 percent supported revitalization and stabilization efforts, 1.4 percent funded community services to low- and moderate-income individuals, and 0.2 percent supported economic development.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 18 LIHTC investments totaling \$52.3 million that supported 1,840 affordable housing units. Additionally, the bank made five HTC investments totaling \$3 million, and two NMTC investments totaling \$3.2 million.

Qualified investments made during the evaluation period included:

- A \$2.5 million LIHTC investment in a project that included 265 affordable townhomes. These rental apartments have applicable LIHTC rent and income restrictions.
- A \$500,000 grant to a historic civil rights organization to support low- and moderate-income participants in developing skills, attaining professional credentials, and obtaining employment.

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 was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Cincinnati MSA	100.0	34	100.0	8.8	11.8	44.1	35.3	0.0	7.3	21.0	37.0	33.2	1.5
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners further considered 14 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which four were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Cincinnati MMSA included two Community Branches, of which one was in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 65 deposit-taking ATMs in the AA, of which 13.8 percent were in low-income geographies and 10.8 percent were in moderate-income geographies. Bank provided data indicated that, during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Cincinnati MMSA	2	3	0	0	-1	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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 two branches and closed three branches, none of which was in a low- or moderate-income geography. The branch closures were the result of low transaction volume, remote location, or proximity to another JPMCB branch.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were 24 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Cincinnati MMSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 1,040 qualified CD service activities to 35 organizations, for a total of 1,719 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, economic development, and revitalization and stabilization to low- and moderate-income individuals, families, and geographies. Leadership was evident by four bank employees spending over 158 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy, and homebuyer education.

Service activities during the evaluation period include:

- JPMCB employees spent 222 hours using their technological expertise to work on innovative projects with nonprofit organizations who serve the needs of low- and moderate-income communities. JPMCB's technology program responded to the need for capacity building by applying JPMCB resources, expertise, and technology skills to create sustainable solutions for nonprofit organizations.
- The bank partnered with several CCAs to provide tailored credit counseling and debt education to 712 individuals accounting for 755 hours. The CCA assisted in providing budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA (DC CSA)

CRA rating for the DC CSA⁶: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in DC CSA

The DC CSA was comprised of a majority of the Washington-Arlington-Alexandria, DC-VA-MD-WV (DC) MSA and Baltimore-Columbia-Towson, MD (Baltimore) MSA, and the entire California-Lexington Park, MD (California) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The DC CSA is JPMCB's 22nd largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$4.2 billion in deposits in the DC CSA, of which approximately \$4 billion represent retail branch deposits, accounting for 0.3 percent of the bank's total deposits. As of December 31, 2023, the bank operated 94 branches and 309 deposit taking ATMs in the area, representing 1.9 percent of total branches and 2 percent of total ATMs. The bank originated and purchased approximately \$15.8 billion in loans, or 2.5 percent of total bank loan originations and purchases, in the DC CSA during the evaluation period.

According to FDIC Deposit Market Share Data as of June 30, 2023, there were 77 FDIC-insured institutions operating 1,589 branches in the AA. JPMCB ranked 14th in deposit market share with 1.1 percent. Primary competitors include Bank of America with 20.3 percent deposit market share, Capital One with 18.6 percent, and Truist Bank with 11.7 percent.

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

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the DC CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: DC CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,869	11.3	21.7	33.1	32.3	1.7
Population by Geography	7,992,117	9.3	21.1	34.5	34.4	0.7
Housing Units by Geography	3,147,086	10.2	21.4	34.5	33.5	0.4
Owner-Occupied Units by Geography	1,839,676	4.3	16.8	37.1	41.7	0.1
Occupied Rental Units by Geography	1,071,609	17.8	28.7	31.3	21.5	0.8
Vacant Units by Geography	235,801	21.7	24.7	28.9	24.0	0.7
Businesses by Geography	987,145	5.4	18.3	35.4	40.3	0.6
Farms by Geography	16,160	3.3	16.0	38.8	41.7	0.1
Family Distribution by Income Level	1,893,313	22.1	16.6	19.9	41.3	0.0
Household Distribution by Income Level	2,911,285	23.7	16.2	18.2	41.9	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$371,905
Median Family Income MSA - 15680 California-Lexington Park, MD MSA		\$98,260	Median Gross Rent			\$1,441
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Families Below Poverty Level			6.4%
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$106,105				
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: DC CSA 2022-223						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,014	9.9	21.8	33.5	32.7	2.1
Population by Geography	8,438,100	8.0	21.9	35.3	33.8	0.9
Housing Units by Geography	3,245,495	9.0	22.1	35.4	32.8	0.7
Owner-Occupied Units by Geography	1,926,509	4.1	17.5	38.1	40.0	0.3
Occupied Rental Units by Geography	1,102,554	15.9	29.2	31.7	21.9	1.3
Vacant Units by Geography	216,432	18.5	25.6	29.6	24.7	1.7
Businesses by Geography	1,287,256	5.3	19.7	36.1	38.1	0.8

Table A – Demographic Information of the Assessment Area Assessment Area: DC CSA 2022-223						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	20,824	3.3	17.2	39.2	39.9	0.4
Family Distribution by Income Level	1,952,237	21.6	16.8	20.5	41.1	0.0
Household Distribution by Income Level	3,029,063	23.6	16.0	18.7	41.7	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housing Value			\$425,271
Median Family Income MSA - 15680 California-Lexington Park, MD MSA		\$110,946	Median Gross Rent			\$1,622
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092	Families Below Poverty Level			5.5%
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$126,224				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the DC CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the DC CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the DC CSA would be \$1,996 using 2015 ACS data and \$2,283 using 2020 Census. Low-income borrowers would be challenged to afford a mortgage payment ranging from \$1,097 to \$1,408 according to 2015 ACS data and from \$1,308 to \$1,614 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,756 to \$2,253 according to 2015 ACS data and ranging from \$2,093 to \$2,582 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 30.8 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Washington, D.C. MSA. Increases ranged from 31.5 percent to 33.8 percent for other components of the DC CSA. This acceleration in home prices worsened existing affordability concerns in the DC CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the DC CSA, 6.4 percent of families had incomes below the FPL according to the 2015 ACS and 5.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, as of December 2023 the non-seasonally adjusted unemployment rate for the DC CSA was 2.5 percent compared to 4.7 percent for the District of Columbia, 2 percent for the state of Maryland, 2.7 percent for the state of Virginia, and 3.5 percent nationally.

Economic Data

Baltimore MD

The Baltimore MD remained a significant underperformer although there were signs of slight improvement. Healthcare employment was growing, and professional and business services recouped about half of the jobs lost in 2022. The labor force was making slow gains but remained below prior peaks. The area's reliance on federal government employment was more than double the national average. The area has experienced decades of net out-migration. Steady out-migration worsened labor supply issues and decreased demand for consumer-driven industries. The area's strengths included being a hub for cybersecurity, established and well-funded medical research centers, and strong transportation and distribution industries. Weaknesses included few public transportation links with Washington, DC, and below-average population growth.

California MSA

The California MSA's economy lost ground, with nonfarm employment contracting during the evaluation period. Public sector employment remained flat, while the private sector shed jobs. Defense spending provided stability due the proximity of a Naval Air Station and its crucial role in national security, ensuring a steady flow of federal dollars. Housing struggled, with residential permitting dropping to near a 40-year low, although limited new housing supply buoyed prices.

Frederick-Gaithersburg-Rockville, MD (Frederick) MD

The Frederick MD's economy showed modest growth during the evaluation period. Job gains in education, healthcare, leisure, hospitality, and administrative services compensated for losses in finance and construction. Despite stable federal and tech employment, overall growth was limited. The labor force remained below pre-pandemic levels. The housing market cooled, with single-family home prices declining for the first time since early 2020. Federal employment was crucial to the local economy. Although tech was driving private sector job growth, gains were tempered by budget tightening amid economic uncertainties. The area was emerging as a biotech hub, benefiting from a highly educated workforce and strong population growth. While immigration slowed, a rebound was anticipated, supporting demand for housing and services in the area.

Washington-Arlington-Alexandria, DC-VA-MD-WV (DC) MD

The DC MD area was more dependent on federal government than any other state. Federal military and civilian wages and salaries made up 29 percent of total wage and salary income in the district compared to 3 percent across the country. The area's economic performance was heavily reliant on the public sector as it accounted for more than one fifth of all jobs in the metro division. The housing market struggled: single-family house prices continued to decline, relative to the post-pandemic peak, even as they turned higher nationally and building activity remained low. Remote work and a high cost of living was weighing on population growth as remote workers opted for lower-cost areas. DC had, by far, the

highest work-from-home rate among states, with a third of employees working from home in 2022. The area's strengths included high per capita income and an educated workforce, residential real-estate resilience, and popular tourist destinations. Weaknesses included a weak public education system, overreliance on the federal government, and a high cost of living and doing business.

Community Contacts

Examiners reviewed seven community contacts completed during the examination period with organizations located throughout the area. The contacts included two community needs assessment meetings conducted with representatives of multiple nonprofit and community-based organizations. These organizations focused on areas such as affordable housing, small business and economic development, community development, human and social services, financial education, and workforce development. Contacts noted that there was a need for more investment in Baltimore's underserved neighborhoods, particularly those in West Baltimore. Underserved neighborhoods need greater access to traditional banking services, particularly bank branches. Contacts noted that the COVID-19 pandemic exacerbated already existing needs such as affordable housing, support for small businesses, access to childcare, economic inequality, and behavioral health issues. Other credit and CD needs identified included:

- Small dollar mortgages for low-income first-time homebuyers
- Access to capital and technical assistance for small businesses
- Support for Volunteer Income Tax Assistance (VITA) programs
- Financing to support rehabilitation of older homes
- Workforce development funding to increase access to living-wage jobs
- Financial Literacy Training
- Funding to increase access to technology for low- and moderate-income individuals
- Affordable Housing (both rental and owner-occupied)
- Support for behavioral health services

The area was served by numerous nonprofit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and community development organizations that provided opportunities to help meet community needs.

Scope of Evaluation in DC CSA

The DC CSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DC CSA

LENDING TEST

The bank's performance under the Lending Test in the DC CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the DC CSA was excellent. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
DC CSA	21,709	121,612	852	190	144,363	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				3	3	0.0	
Totals	21,709	121,612	852	193	144,366	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
DC CSA	12,578,694	1,470,142	8,827	1,697,586	15,755,249	99.8	100.0
Broader Statewide/Regional Area							
Indirect Benefit				26,383	26,383	0.2	
Totals	12,578,694	1,470,142	8,827	1,723,969	15,781,632	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.1 percent. The bank ranked 14th among 77 depository financial institutions placing it in the top 19 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 36th among 872 home mortgage lenders in the AA, which placed it in the top 5 percent of lenders. The top three lenders were Rocket Mortgage (5.6 percent), Truist Bank (3.8 percent), and Navy Federal Credit Union (3.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 16.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 229 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (28.8 percent), Bank of America (13.5 percent), and Capital One (7.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 34.2 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 29 small farm lenders in the AA. The other top lenders were John Deere Financial (19.7 percent), Wells Fargo Bank (9.6 percent), and U.S. Bank (9.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the DC CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 190 CD loans totaling \$1.7 billion, which represented 407.9 percent of the allocated tier 1 capital. By dollar volume, 74.4 percent of these loans funded affordable housing that supported 8,840 units, 25.3 percent funded revitalization and stabilization efforts, and 0.3 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 10 PPP loans totaling \$16.8 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

- A \$105 million to construct an office building to house the headquarters of a local government agency. The project will be located in an underserved low-income Opportunity Zone and will provide new job opportunities to area residents.
- A \$75.6 million loan for a 344-unit multifamily development located in a community facing economic stress and targeted by the city for redevelopment. The project will include 34 units designated as affordable.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 3,138 loans in the amount of \$809.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	440	117,292
Federal Housing Administration (FHA)	54	17,651
Chase Homebuyer Grant Loans	257	96,282
Homebuyer Education Grants	192	96
Home Lending SPCP	225	88,024
Community Lending Program (Correspondent SPCP)	528	179,857
Veteran's Administration (VA)	35	18,246
VA Purchase Closing Credit	15	6,527

Loan Type	Number of Loans	Dollar Amount (\$000s)
Business Card SPCP	338	1,431
Business Banking SPCP	87	7,162
Paycheck Protection Program (PPP)	913	200,853
Affordable Housing Preservation Program	54	156,643
Total	3,138	890,064

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the DC CSA.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$26.4 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These consisted of three loans that support 201 units of affordable housing for low- and moderate- income individuals.

INVESTMENT TEST

The bank's performance under the Investment Test in the DC CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the DC CSA was excellent. Investments in the broader statewide or regional areas supported the Investment Test conclusion.

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
DC CSA	40	56,416	95	424,582	135	95.7	480,998	92.6	1	3,137
Broader Statewide/Regional Area										
Indirect Benefit	3	10,995	3	27,470	6	4.3	38,465	7.4	0	0
Total	43	67,411	98	452,052	141	100.0	519,463	100.0	1	3,137
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The dollar volume of current- and prior-period investments represented 115.6 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 57 grants and donations, totaling \$24.8 million to 32 organizations.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 78.8 percent of investments supported affordable housing, 15.5 percent supported revitalization

and stabilization efforts, 5.2 percent funded community services to low- and moderate-income individuals, and 0.5 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 19 LIHTC investments totaling \$276.4 million that supported 2,097 affordable housing units. Additionally, the bank made eight NMTC investments totaling \$59.1 million and six HTC investments totaling \$12.6 million.

Qualified investments made during the evaluation period include:

- A \$23.9 million LIHTC investment that supported the acquisition and rehabilitation of two multifamily properties. This project created 163 units of affordable housing for individuals and families earning 60 percent or less of the AMI. In addition, seven units were designated as permanent supportive housing for persons experiencing homelessness.
- A \$10.1 million NMTC investment to expand a healthcare facility in a low-income geography. The investment allowed the facility to enhance the medical services offered to the community, increasing the community's access to affordable healthcare, and served to revitalize and stabilize the area.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the DC CSA. Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$38.5 million in current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included three LHITC investments that supported 238 units of affordable housing for low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in the DC CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the DC CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
DC CSA	100.0	94	100.0	8.5	20.2	28.7	42.6	0.0	8.0	21.9	35.3	33.8	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners further considered 22 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 10 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the DC CSA included a Community Branch in a moderate-income geography and two Community Center Branches, one in a low-income geography and the other in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 309 deposit-taking ATMs in the AA, of which 7.8 percent were in low-income geographies and 18.4 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
DC CSA	62	1	5	11	19	26	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 62 branches, of which five were in low-income geographies and 11 were in moderate-income geographies. The bank closed one branch, which was not in a low- or moderate-income geography. The branch closure was the result of the branch being a temporary location for student orientation on a college campus.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 4:00 p.m. or 5:00 p.m., Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturday. There was one location with a drive-thru facility operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the DC CSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 5,417 qualified CD service activities to 176 organizations, for a total of 10,955 hours. A

majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 21 bank employees spending over 1,957 hours participating on boards and committees for 31 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and debt education, pre-purchase homebuyer education, and financial capability training.

Service activities during the evaluation period include:

- The bank partnered with 16 nonprofit CCAs and assisted 3,405 individuals with credit counseling and debt education. JPMCB sponsored budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.
- JPMCB employees completed 592 activities providing 921 hours of technical assistance trainings and mentorships to two MDIs. The bank's employees leveraged their expertise, network, and resources to support loan and deposit growth, provide access to institutional investors, boost technological capabilities, and develop new revenue streams.

Boston-Worcester-Providence, MA-RI-NH-CT CSA (Boston CSA)

CRA rating for the Boston CSA⁷: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Boston CSA

The Boston CSA was comprised of a majority of the Boston-Cambridge-Newton, MA-NH (Boston) MSA; the entire Providence-Warwick, RI-MA (Providence) MSA and Manchester-Nashua, NH (Manchester) MSA; and a portion of the Worcester, MA-CT (Worcester)MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Boston CSA is JPMCB's 17th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$9.1 billion in deposits in the Boston CSA, of which approximately \$8.9 billion represent retail branch deposits, accounting for 0.6 percent of the bank's total deposits. As of December 31, 2023, the bank operated 75 branches and 275 deposit-taking ATMs in the area, representing 1.5 percent of total branches and 1.8 percent of total ATMs. The bank originated and purchased approximately \$15.2 billion in loans, or 2.4 percent of total bank loan originations and purchases, in the Boston CSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 116 FDIC-insured institutions operating 1,800 branches in the AA. JPMCB ranked eighth in deposit market share with 1.6 percent. Primary competitors include State Street Bank and Trust Company with 29.3 percent deposit market share, Bank of America with 19.7 percent, and Citizens Bank with 13.8 percent.

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

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Boston CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Boston CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,610	11.9	19.2	37.8	29.1	1.9
Population by Geography	7,390,623	9.9	18.5	39.4	31.9	0.4
Housing Units by Geography	3,038,410	9.8	19.2	40.1	30.6	0.3
Owner-Occupied Units by Geography	1,736,256	3.4	13.3	44.6	38.6	0.1
Occupied Rental Units by Geography	1,072,050	19.4	28.0	33.8	18.2	0.5
Vacant Units by Geography	230,104	13.0	22.8	35.8	28.0	0.4
Businesses by Geography	731,294	7.6	15.4	37.6	38.8	0.6
Farms by Geography	16,166	3.7	10.3	42.7	43.2	0.1
Family Distribution by Income Level	1,800,065	23.0	16.4	19.7	40.9	0.0
Household Distribution by Income Level	2,808,306	26.1	14.6	16.5	42.8	0.0
Median Family Income MSA - 14454 Boston, MA		\$90,699	Median Housing Value			\$344,297
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		\$100,380	Median Gross Rent			\$1,145
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$85,966	Families Below Poverty Level			7.9%
Median Family Income MSA - 39300 Providence-Warwick, RI-MA MSA		\$73,950				
Median Family Income MSA – 40484 Rockingham County-Strafford County, NH		\$90,150				
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Boston CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,779	10.6	18.0	37.9	30.3	3.2
Population by Geography	7,772,370	9.6	18.1	39.0	32.5	0.9
Housing Units by Geography	3,132,003	9.2	18.4	40.0	31.7	0.7
Owner-Occupied Units by Geography	1,817,534	3.3	13.6	43.7	39.0	0.3
Occupied Rental Units by Geography	1,097,409	18.6	26.2	33.9	20.0	1.3

Table A – Demographic Information of the Assessment Area Assessment Area: Boston CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Vacant Units by Geography	217,060	10.8	19.7	39.3	29.0	1.1
Businesses by Geography	899,499	7.3	14.9	37.5	39.3	1.1
Farms by Geography	19,230	3.4	11.8	42.7	41.7	0.4
Family Distribution by Income Level	1,854,481	22.3	16.5	20.3	40.8	0.0
Household Distribution by Income Level	2,914,943	26.0	14.7	16.9	42.4	0.0
Median Family Income MSA - 14454 Boston, MA		\$112,607	Median Housing Value			\$432,383
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA		\$121,481	Median Gross Rent			\$1,398
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$103,238	Families Below Poverty Level			6.3%
Median Family Income MSA - 39300 Providence-Warwick, RI-MA MSA		\$89,555				
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH		\$107,377				
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$96,860				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Boston CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Boston CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Boston CSA would be \$1,848 using 2015 ACS data and \$2,321 using 2020 Census. Low-income borrowers would be challenged to afford a mortgage payment ranging from \$924 to \$1,255 according to 2015 ACS data and from \$1,119 to \$1,519 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,479 to \$2,008 according to 2015 ACS data and ranging from \$1,791 to \$2,430 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 41.2 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Boston MSA. Increases ranged from 38.7 percent to 53.7 percent for other components of the Boston CSA. This acceleration in home prices worsened existing affordability concerns in the Boston CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Boston CSA, 7.9 percent of families had incomes below the FPL according to the 2015 ACS and 6.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Boston-Cambridge area was 3.1 percent compared to 3.5 percent for the state of Massachusetts and 3.5 percent nationally.

Economic Data

Boston MD

The Boston MD's economy underperformed during the evaluation period. Employment gains were minimal, as government losses offset growth in tech-heavy professional services and recovering leisure, hospitality, healthcare, and personal services. Challenges for tech startups included securing venture capital and funding due to higher interest rates and declining equity prices. The finance industry faced limited job growth prospects amid rising interest rates and falling equity prices. Multifamily housing dominated Boston's housing stock, but tight supply persisted due to low rental vacancy rates, prompting a rise in multifamily permits locally and nationally.

Cambridge-Newton-Framingham, MD (Cambridge) MD

The Cambridge MD's economy performed well during the evaluation period. Job growth was driven by robust growth in tech-heavy professional and business services, with healthcare and government also recovering. Biotech startups faced challenges securing funds amid rising interest rates and lower equity prices. In information technology, employment growth decelerated, as tighter financial conditions hindered hiring and remote workers left due to high living costs. Local service industries faced greater losses due to persistent remote worker outflows. The housing market underperformed, with weaker house price gains than the national average and minimal homebuilding increases.

Manchester MSA

The Manchester MSAs economy moved in a positive direction during the evaluation period. Nonfarm employment rose despite volatility in the national labor market. Education and healthcare payrolls reached post-pandemic highs. Manufacturing gains accelerated, benefiting from the high-wage nature of these positions. Financial services expanded which supported consumer industries due to high-wage jobs. High wages and low tax burdens strengthened the consumer profile, with wealthy commuters contributing to local spending. Healthcare played a significant role, with the 65-and-older cohort growing faster than the regional average, driven by the area's appeal as a retirement destination. House price appreciation slowed, coinciding with a reduction in single-family permitting.

Providence MSA

The Providence MSA's economy declined during the evaluation period. While goods producers advanced, public sector showed minimal improvements. Labor supply challenges hampered key

industries like healthcare and finance. Healthcare job growth stalled due to difficulties in sourcing skilled labor, particularly in hospitals and nursing homes. The financial industry faced mixed conditions, with rising interest rates benefiting credit intermediaries but equity market instability posing risks for investment firms. High costs and demographic issues made the Providence MSA less competitive compared to other regions. Proximity to Boston was vital, as many residents commuted there for higher-paying jobs, maintaining household employment growth despite local payroll declines.

Rockingham County-Strafford County NH (Rockingham County) MD

Rockingham County MD's economy struggled to gain momentum during the evaluation period. Manufacturing employment increased slightly, while healthcare and professional/business services employment remained stagnant. High wage manufacturing jobs supported local hospitality and retail businesses. Healthcare gains exceeded the regional average, driven by the expanding 65-and-older population attracted by favorable tax conditions and outdoor activities. Population growth doubled the regional average, aided by access to Boston jobs, natural amenities, affordability, and favorable taxes, supporting the housing market despite a brief price pullback.

Worcester MSA

Worcester's recovery slowed during the evaluation period with job additions below average. Manufacturing showed strength, but healthcare and leisure/hospitality gains were modest, while government and personal services lost staff. Manufacturing remained a key sector, with employment bolstered by semiconductor, pharmaceutical, and plastics industries, benefiting from high chip prices and global demand for COVID-19 vaccines. Commuters returning to offices in Boston and Cambridge reduced spending in Worcester, impacting consumer industries like leisure/hospitality and retail. The housing market saw mixed performance, with house price appreciation faster than the Northeast but slower than nationally.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations located throughout the area. These organizations focused on areas such as affordable housing, small business and economic development, community services, and financial capability. The most prevalent need identified by most contacts was affordable housing. Contacts noted the high cost of housing throughout much of the CSA and the need to develop more affordable rental and homeownership options. High housing costs and lack of inventory discouraged or prevented many low- and moderate-income households from potential homeownership opportunities. Many locations in the CSA had significant numbers of unskilled workers in minimum wage jobs whose earnings were insufficient to cover the cost of housing. In addition, high levels of student loan debt prevented individuals from qualifying for mortgage credit. Contacts noted the need for commercial development financing to help spur economic development in the downtown or main street areas in several Worcester County localities. Many communities had growing elderly populations in need of affordable and accessible housing. Contacts also noted that the COVID-19 pandemic exacerbated food and housing insecurity issues among many low and moderate-income households. Credit and CD needs identified included:

- Affordable housing (both owner-occupied and rental)
- Affordable childcare
- Access to transportation services

- Gap financing for community development projects
- Loans for commercial development to revitalize downtown and main street areas
- Financial education programing, including budgeting for seasonal workers
- Small business loans
- Home rehab funding to help elders age in place

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

Scope of Evaluation in Boston CSA

The Boston CSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON CSA

LENDING TEST

The bank's performance under the Lending Test in the Boston CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Boston CSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Boston CSA	28,272	73,801	668	33	102,774	100.0	100.0
Totals	28,272	73,801	668	33	102,774	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Boston CSA	14,073,909	873,449	7,432	264,465	15,219,255	100.0	100.0
Totals	14,073,909	873,449	7,432	264,465	15,219,255	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.6 percent. The bank ranked eighth among 116 depository financial institutions placing it in the top 7 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked 31st among 712 home mortgage lenders

in the AA, which placed it in the top 5 percent of lenders. The top three lenders were Citizen's Bank (10 percent), Rocket Mortgage (3.6 percent), and Guaranteed Rate (2.8 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 214 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (29.4 percent), Bank of America (11.8 percent), and Capital One (7.2 percent).

In overall small loans to farms for 2022, the bank had a market share of 29.5 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 24 small farm lenders in the AA, which placed it in the top 9 percent of lenders. The other top lenders were U.S. Bank (32.8 percent), Capital One (12.1 percent), and Bank of America (9.9 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with, the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the Boston CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Boston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 33 CD loans totaling \$264.5 million, which represented 28.7 percent of the allocated tier 1 capital. By dollar volume, 63.2 percent of these loans funded affordable housing, 36.8 percent funded revitalization and stabilization efforts, and less than 0.1 percent funded economic development. Of the total CD loans, the bank made 10 PPP loans totaling \$19.4 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

- A \$14 million participation in a loan for the acquisition and adaptive reuse of a school building in a moderate-income geography. The project created 85 affordable housing units for seniors, of which 68 units would be reserved for seniors with incomes of 60 percent or less of the AMI and 17 units reserved for seniors with incomes of 30 percent or less of the AMI.

- A \$24.1 million construction loan for a new 123-unit multi-family housing development located in a moderate-income geography. The project contained 93 units reserved for households with incomes of 60 percent or less of the AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 1,212 loans in the amount of \$393.5 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	213	57,179
Federal Housing Administration (FHA)	24	9,640
Chase Homebuyer Grant Loans	257	106,133
Homebuyer Education Grants	69	35
Home Lending SPCP	15	5,918
Community Lending Program (Correspondent SPCP)	45	17,513
Veteran's Administration (VA)	9	4,936
VA Purchase Closing Credit	5	3,053
Business Card SPCP	69	271
Business Banking SPCP	16	1,028
Paycheck Protection Program (PPP)	478	142,374
Affordable Housing Preservation Program	12	45,403
Total	1,212	393,483

INVESTMENT TEST

The bank's performance under the Investment Test in the Boston CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Boston CSA was excellent. Investments in the broader statewide or regional areas supported the Investment Test conclusion.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 24.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 30 grants and donations, totaling \$14 million to 13 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Boston CSA	41	60,020	42	162,343	83	98.8	223,363	99.9	0	0
Broader Statewide/Regional Area										
Indirect Benefit	1	319	0	0	1	1.2	319	0.1	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Total	42	60,339	42	162,343	84	100.0	222,682	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 86.4 percent of investments supported affordable housing, 7.7 percent funded community services to low- and moderate-income individuals, 5.7 percent supported revitalization and stabilization efforts, and 0.2 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made nine LIHTC investments totaling \$109.8 million that supported 819 affordable housing units. Additionally, the bank made one NMTC investment totaling \$4.2 million.

Qualified investments made during the evaluation period include:

- A \$4.2 million NMTC investment to a business in a low-income geography that makes and delivers fresh and healthy meals to students, seniors, and other food insecure communities. The investment supported revitalization and stabilization efforts allowing the business to create additional sustainable, quality jobs and support the growth of local farming and food production.
- Four grants totaling almost \$6.3 million to support a local school improvement organization. The grants were part of a multi-year strategy to support disabled students' progress through the education system. Over 72 percent of the students were from low- or moderate-income families.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the Boston CSA. Because the bank was responsive to CD needs and opportunities in its AA, examiners considered a \$319,000 prior-period investment in the broader statewide or regional area that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. The bank participated in a LIHTC fund that supported 24 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the Boston CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Boston CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Boston CSA	100.0	75	100.0	10.7	17.3	25.3	45.3	1.3	9.6	18.1	39.0	32.5	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners further considered 24 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 11 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Boston CSA included a Community Branch in a low-income geography and a Community Center Branch in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. The bank had 275 deposit-taking ATMs in the AA, of which 8.7 percent were in low-income geographies and 17.8 percent were in moderate-income geographies. The bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Boston CSA	54	0	5	9	20	20	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 54 branches, of which five were in low-income geographies and nine were in moderate-income geographies. The bank did not close any branches during the evaluation period in the Boston CSA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were no locations with drive-thru facilities operating in this AA.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Boston CSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 3,723 qualified CD service activities to 126 organizations, for a total of 8,444 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, economic development, and revitalization and stabilization to low- and moderate-income individuals, families, and geographies. Leadership was evident by 29 bank employees spending over 1,443 hours participating on boards and committees for 29 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with community service.

Service activities during the evaluation period include:

- JPMCB employees provided 316 hours of technical assistance trainings and mentorships to an MDI. The bank's employees leveraged their expertise, network, and resources to support loan and deposit growth, provide access to institutional investors, boost technological capabilities and develop new revenue streams.
- JPMCB partnered with CCAs to provide financial capability training to 4,127 low- and moderate-income youth and adults. The training covered budget counseling, debt management, and financial education.

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MMSA (Philadelphia MMSA)

CRA rating for the Philadelphia MMSA⁸: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Philadelphia MMSA

The Philadelphia MMSA was comprised of a majority of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD (Philadelphia) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Philadelphia MMSA is JPMCB's 27th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$2.5 billion in deposits in the Philadelphia MMSA, of which approximately \$2.4 billion represent retail branch deposits, accounting for 0.2 percent of the bank's total deposits. As of December 31, 2023, the bank operated 56 branches and 205 deposit taking ATMs in the area, representing 1.1 percent of total branches and 1.3 percent of total ATMs. The bank originated and purchased approximately \$6 billion in loans, or 0.9 percent of total bank loan originations and purchases, in the Philadelphia MMSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 85 FDIC-insured institutions operating 1,328 branches in the AA. JPMCB ranked 18th in deposit market share with 0.4 percent. Primary competitors include Capital One with 37.6 percent deposit market share, TD Bank, N.A. with 18.3 percent, and Wells Fargo Bank with 5.7 percent.

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.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Philadelphia MMSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Philadelphia MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,433	6.9	23.9	37.4	30.4	1.4
Population by Geography	5,868,600	6.7	22.8	38.5	31.7	0.3
Housing Units by Geography	2,374,723	6.9	23.8	38.1	31.0	0.2
Owner-Occupied Units by Geography	1,464,554	3.6	18.4	41.5	36.5	0.0
Occupied Rental Units by Geography	705,358	11.7	31.8	33.5	22.5	0.5
Vacant Units by Geography	204,811	13.3	34.7	30.3	21.5	0.2
Businesses by Geography	690,673	4.5	19.3	37.2	38.5	0.5
Farms by Geography	13,201	2.1	14.5	45.5	37.8	0.1
Family Distribution by Income Level	1,402,918	22.0	17.2	19.9	40.8	0.0
Household Distribution by Income Level	2,169,912	25.2	15.6	17.0	42.3	0.0
Median Family Income MSA - 15804 Camden, NJ MD		\$87,133	Median Housing Value			\$241,896
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA MD		\$99,939	Median Gross Rent			\$1,054
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Families Below Poverty Level			9.2%
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Philadelphia MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,510	6.6	22.5	36.3	31.3	3.3
Population by Geography	6,076,489	6.5	22.4	38.0	32.0	1.2
Housing Units by Geography	2,427,533	6.8	23.1	37.9	31.3	1.0
Owner-Occupied Units by Geography	1,508,472	4.0	18.7	40.9	35.7	0.6
Occupied Rental Units by Geography	741,273	11.2	30.2	33.4	23.8	1.4
Vacant Units by Geography	177,788	12.1	30.8	30.2	25.0	2.0
Businesses by Geography	872,506	4.8	19.4	35.3	38.5	2.0
Farms by Geography	15,839	2.7	16.1	43.8	36.6	0.7

Table A – Demographic Information of the Assessment Area Assessment Area: Philadelphia MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	1,450,586	21.7	17.3	20.1	40.9	0.0
Household Distribution by Income Level	2,249,745	25.1	15.6	17.2	42.1	0.0
Median Family Income MSA - 15804 Camden, NJ MD		\$100,987	Median Housing Value			\$269,905
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA MD		\$117,345	Median Gross Rent			\$1,211
Median Family Income MSA - 37964 Philadelphia, PA MD		\$68,458	Families Below Poverty Level			8.2%
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$93,347				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Philadelphia MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Philadelphia MMSA, some low- and some moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Philadelphia MMSA would be \$1,299 using 2015 ACS data and \$1,449 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment ranging from \$705 to \$1,249 according to 2015 ACS data and from \$856 to \$1,467 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,128 to \$1,999 according to 2015 ACS data and ranging from \$1,369 to \$2,347 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 34 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Philadelphia MD. Increases ranged from 43.3 percent to 62.5 percent for other components of the Philadelphia MMSA. This acceleration in home prices creates new affordability concerns in the Philadelphia MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Philadelphia MMSA, 9.2 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Philadelphia MMSA was 3.3 percent compared to 2.9 percent for the state of Pennsylvania, 4.5 percent for the state of New Jersey, and 3.7 percent for the state of Delaware, and 3.5 percent nationally.

Economic Data

Camden, NJ (Camden) MD

The Camden MD's economy showed strong growth toward the end of the evaluation period, driven by sectors like leisure/hospitality, logistics, and healthcare. The unemployment rate fell below 4 percent, while residential permits remained high despite rising mortgage rates. The city's port, a key player in national supply chains, saw a surge in demand during the pandemic, but as inflation reduced retail spending, cargo volumes and logistics jobs declined. Economic uncertainty affected the professional services and high-tech sectors, with volatility in financial markets leading to job setbacks and hiring freezes in the financial services industry. Healthcare remained a robust driver of job creation in Camden, buoyed by a large, aging population and strong medical institutions. Camden's healthcare sector showed resilience, recovering quickly from pandemic-related job losses.

Montgomery County-Bucks County-Chester County, PA (Montgomery County) MD

The Montgomery MD's economy outpaced many Northeastern areas, with steady job growth bringing employment close to pre-pandemic levels. The unemployment rate dropped, and labor force growth exceeded the regional average. Professional services and healthcare were the key drivers of this growth, with the healthcare sector benefiting from strong demand due to an aging population, high household incomes, and excellent local facilities. Although staffing challenges persisted in healthcare post-pandemic, state funding for nurse retention, including pay increases and student loan forgiveness, supported expansion. The professional services sector also grew rapidly, particularly in office-related fields. The goods-producing sector, particularly housing, struggled with payroll declines due to a cooling market and slowing home price appreciation. Despite housing affordability challenges, the MD attracted new residents, especially from Philadelphia, due to high educational attainment, reputable schools, and favorable suburban living conditions.

Philadelphia, PA (Philadelphia) MD

The Philadelphia MD's economy experienced a slowdown during the evaluation period. The education sector saw payroll reductions, and public sector growth lagged behind state and national trends. Healthcare remained a strong point, outperforming other sectors with above-average growth. Professional services, especially finance and technical sectors, grew faster than regional counterparts, with several large banks opening research centers in the city. However, Philadelphia's unfavorable tax structure limited job growth compared to other large cities, while single-family home price appreciation moderated faster than in neighboring areas. Tourism, hybrid work models, and mixed-use developments in leisure and retail sectors contributed to the areas recovery.

Wilmington, DE-MD-NJ (Wilmington) MD

The Wilmington MD's economy showed signs of recovery, though job growth lagged behind national trends. While finance employment struggled and logistics payrolls remained stable, the leisure and

hospitality sectors saw a resurgence, partially offsetting weaknesses in other areas. Residential construction dropped to near-decade lows, and house price growth slowed to align with national trends. Higher interest rates boosted banking profits but negatively impacted payrolls, particularly in mortgage-related sectors. Mortgage brokers faced layoffs as demand for new loans, especially mortgages, declined. The Port of Wilmington, with its focus on refrigerated cargo, experienced record traffic and ongoing expansion. Both office and residential real estate sectors faced challenges, with remote work reducing demand for office space, resulting in high vacancy rates, and higher mortgage rates cooling house price growth.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations located throughout the area. These organizations focused on areas such as affordable housing, workforce development, small business financing and support, and financial capability. Several contacts noted the challenges faced by individuals as well as small businesses during the COVID-19 pandemic. Restaurants, childcare facilities, and healthcare focused businesses struggled. Many businesses had to innovate or change their business model to continue operating. Telework remained common for professional services employees. A reduced number of commuters impacted service-based industries. Contacts noted that during the pandemic many small businesses were unable to access PPP loans. Contacts identified gentrification driving increased housing costs for low- and moderate-income households and rising rents for small business owners. Contacts noted that there had been an increase in the number of micro and small businesses as individuals looked for new income sources, resulting in a need for technical assistance as well as start-up capital. Contacts noted that housing values were increasing in many communities yet consumers with credit challenges were unable to take advantage of record low interest rates by refinancing. Foreclosures remained an issue in some New Jersey communities. Other needs identified include:

- Foreclosure prevention and eviction support services
- Flexible mortgage products for first time homebuyers
- Home rehabilitation loans, particularly for low and moderate-income senior homeowners
- Affordable housing (both rental and owner-occupied)
- Funding for housing counseling, budgeting, and credit counseling programs
- Equity capital for small businesses
- Start-up capital and funding for early-stage companies
- Unrestricted grant funding for nonprofit organizations

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

Scope of Evaluation in Philadelphia MMSA

The Philadelphia MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADELPHIA MMSA

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Philadelphia MMSA	15,984	62,066	481	12	78,543	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				4	4	0.0	
Total	15,984	62,066	481	16	78,547	100.00	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Philadelphia MMSA	5,130,554	773,909	5,509	35,371	5,945,343	99.8	100.0
Broader Statewide/Regional Area							
Indirect Benefit				12,089	12,089	0.2	
Total	5,130,554	773,909	5,509	47,460	5,957,432	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.4 percent. The bank ranked 18th among 85 depository financial institutions placing it in the top 22 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked 23rd among 839 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Citizen's Bank (6.7 percent), Rocket Mortgage (5.1 percent), and Police and Fire Federal Credit Union (4.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 224 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (29.8 percent), Capital One (7 percent), and Bank of America (6.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 27.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 29 small farm lenders in the AA. The other top lenders were U.S. Bank (16 percent), John Deere Financial (7.2 percent), and Wells Fargo Bank (6.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and well below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 12 CD loans totaling \$35.4 million, which represented 14 percent of the allocated tier 1 capital. By dollar volume, 74.2 percent of these loans funded affordable housing, 21.1 percent funded revitalization and stabilization efforts, 4.6 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made three PPP loans totaling \$987,797 to provide relief for organization due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

- A \$10.4 million construction loan to support the rehabilitation of 97 affordable housing units. All units were reserved for households earning 50 percent or less of the AMI and are eligible for Section 8 vouchers.
- A \$3.5 million loan to pay-off the existing loan balance of another lender for a multiple site project consists of 110 units restricted to households at 50 percent of AMI.

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, a total of 2,148 loans in the amount of \$368.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	326	62,038
Federal Housing Administration (FHA)	94	20,617
Chase Homebuyer Grant Loans	238	63,183
Homebuyer Education Grants	197	99
Home Lending SPCP	208	45,690
Community Lending Program (Correspondent SPCP)	160	41,109
Veteran's Administration (VA)	15	6,085
VA Purchase Closing Credit	5	2,165
Business Card SPCP	177	725
Business Banking SPCP	41	3,023
Paycheck Protection Program (PPP)	687	123,516
Total	2,148	368,250

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the Philadelphia CSA.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$12.1 million of CD loans in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These loans supported affordable housing, community services, and revitalization/stabilization through a PPP loan to provide relief for an organization due to the COVID-19 pandemic.

INVESTMENT TEST

The bank's performance under the Investment Test in the Philadelphia MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent. Investments in the broader statewide or regional areas supported the Investment Test conclusion.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 64.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 63 grants and donations, totaling \$13.9 million to 47 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Philadelphia MMSA	28	75,562	70	88,010	98	86.7	163,571	78.1	0	0
Broader Statewide/Regional										
Indirect Benefit	12	43,061	3	2,735	15	13.3	45,796	21.9	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Total	40	118,623	73	90,745	113	100.0	209,368	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 57.9 percent of investments supported affordable housing, 30.4 percent funded community services to low- and moderate-income individuals, 11.4 percent supported revitalization and stabilization efforts, and 0.4 percent supported economic development.

The bank occasionally used innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$4.8 million that supported 57 affordable housing units. Additionally, the bank made one NMTC investment totaling \$7.8 million and two HTC investments totaling \$2.4 million.

Qualified investments made during the evaluation period include:

- A \$7.8 million NMTC equity investment to a nonprofit organization that supports low- and moderate-income young adults who have not completed high school. The proceeds financed the renovation and expansion of an existing building, allowing the organization to increase the number of program participants. Students who complete the program earn a high school diploma and are connected to employers and postsecondary institutions.
- A \$2 million grant to the local chapter of a nationwide community development organization. The organization works with residents and partners in historically disinvested communities to identify and cultivate local entrepreneurs, support existing and attract new businesses, finance the redevelopment of mixed-use properties to meet local needs, provide flexible capital to businesses, and support pathways to homeownership and affordable rental housing.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the Philadelphia CSA. Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$45.8 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve those AAs. These investments supported affordable housing, community services for low- and moderate-income individuals, and economic development activities.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Philadelphia MMSA	100.0	56	100.0	7.1	30.4	21.4	37.5	3.6	6.5	22.4	38.0	32.0	1.2
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered 16 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which seven were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Philadelphia MMSA included two Community Branches, of which one was in a moderate-income geography. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and supports the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 205 deposit-taking ATMs in the AA, of which 6.8 percent were in low-income geographies and 28.8 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services to both retail and business customers and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Philadelphia MMSA	40	0	4	10	17	9	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 40 branches, of which four were in low-income geographies and ten were in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 4:00 p.m. or 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Philadelphia MMSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 4,267 qualified CD service activities to 115 organizations, for a total of 12,183 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, economic development, and revitalization and stabilization to low- and moderate-income individuals, families, and geographies. Leadership was evident by 22 bank employees spending over 1,665 hours participating on boards and committees for 20 different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- A JPMCB employee provided 250 hours of service on the board of local community services nonprofit organization. The organization specializes in intergenerational programming, including early education and youth development, adult education and workforce development, and adult day care.
- JPMCB employees partnered with a social services organization to provide financial health and capability trainings for summer youth employment program participants. The employees worked closely with the organization to incorporate financial capability into their existing programming at a level that was appropriate for the youth. The workshops provided participants with lessons and skills on budgeting, banking, debt, and savings.

St. Louis, MO-IL MMSA (St. Louis MMSA)

CRA rating for the St. Louis MMSA⁹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA(s).
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in St. Louis MMSA

The St. Louis MMSA was comprised of a portion of the St. Louis, MO-IL (St. Louis) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The St. Louis MMSA is JPMCB's 36th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$662.5 million in deposits in the St. Louis MMSA, of which approximately \$612.7 million represent retail branch deposits, accounting for less than 0.1 percent of the bank's total deposits. As of December 31, 2023, the bank operated 25 branches and 91 deposit taking ATMs in the area, representing 0.5 percent of total branches and 0.6 percent of total ATMs. The bank originated and purchased approximately \$2.7 billion in loans, or 0.4 percent of total bank loan originations and purchases, in the St. Louis MMSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 83 FDIC-insured institutions operating 639 branches. JPMCB ranked 30th in deposit market share with 0.5 percent. Primary competitors include U.S. Bank with 15.4 percent deposit market share, Stifel Bank and Trust with 12.7 percent, and Bank of America with 12.6 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the St. Louis MMSA for each period.

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

Table A – Demographic Information of the Assessment Area Assessment Area: St Louis MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	547	14.4	21.4	32.9	30.5	0.7
Population by Geography	2,449,944	9.9	19.7	35.7	34.4	0.3
Housing Units by Geography	1,083,823	11.4	21.0	35.6	31.7	0.3
Owner-Occupied Units by Geography	663,559	5.7	17.6	38.0	38.7	0.1
Occupied Rental Units by Geography	308,161	18.1	26.3	33.6	21.3	0.6
Vacant Units by Geography	112,103	27.1	26.6	27.1	18.8	0.3
Businesses by Geography	203,656	7.3	18.7	32.4	40.8	0.9
Farms by Geography	5,131	3.6	14.8	41.3	39.8	0.4
Family Distribution by Income Level	624,598	21.7	16.9	19.6	41.8	0.0
Household Distribution by Income Level	971,720	24.2	15.9	17.3	42.6	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$166,734
			Median Gross Rent			\$840
			Families Below Poverty Level			9.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: St Louis MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	12.1	21.3	35.4	30.1	1.2
Population by Geography	2,460,963	7.2	18.6	38.7	35.1	0.4
Housing Units by Geography	1,106,750	9.8	20.6	37.9	31.1	0.6
Owner-Occupied Units by Geography	679,885	4.8	16.5	40.0	38.4	0.3
Occupied Rental Units by Geography	320,849	16.0	26.0	36.4	20.6	1.0
Vacant Units by Geography	106,016	22.5	31.2	28.6	16.2	1.5
Businesses by Geography	424,529	7.4	15.3	33.5	43.0	0.8
Farms by Geography	9,351	5.3	14.8	38.1	41.5	0.4
Family Distribution by Income Level	628,557	20.6	17.6	20.8	41.0	0.0
Household Distribution by Income Level	1,000,734	23.8	16.2	17.8	42.2	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: St Louis MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$84,758	Median Housing Value			\$190,109
			Median Gross Rent			\$939
			Families Below Poverty Level			7.4%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the St. Louis MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the St. Louis MMSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2015 ACS data. The monthly mortgage payment for the median home in the St. Louis MMSA would be \$895 using 2015 ACS data and \$1,021 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment exceeding \$884 according to 2015 ACS data and \$1,059 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,414 according to 2015 ACS data and \$1,695 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 38.7 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the St. Louis MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the St. Louis MMSA, 9.8 percent of families had incomes below the FPL according to the 2015 ACS and 7.4 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the St. Louis MMSA was 3 percent compared to 4.2 percent for the state of Illinois, 2.8 percent for the state of Missouri, and 3.5 percent nationally.

Economic Data

The St. Louis MSA recovered from its unemployment spike seen at the start of 2020 and had lower unemployment than prior to the pandemic but still lagged the rest of the state of Missouri in overall

unemployment. Recovery was most notably seen in the manufacturing sector, which recovered at a faster rate than expected, but the healthcare, finance, and government sectors were lagging in their recovery from the pandemic. The area had below average living and business costs, below-average employment volatility, and an overeducated workforce relative to local industry. It suffered from persistent out-migration, including the loss of young, educated workers, and declining manufacturing.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the AA. These organizations focused on areas such as small business, economic development, and affordable housing. Contacts noted that there were significant pockets of low- and moderate-income tracts that were either underbanked or did not have access to banking services. There was a need for small businesses to be recognized by banks and provided with funding. Affordable housing was a significant need in the community. Many jobs in the area, especially from hospitality and tourism, employed low- and moderate-income individuals, but these employees were unable to find affordable housing nearby. The quality of area Section 8 housing was poor, due to a relative lack of funds for maintenance and improvements. There were individuals who could afford to pay rent and utilities every month but struggled to obtain traditional financing and support to become first-time homebuyers. Struggling areas in the region continued to be the city of St. Louis, north St. Louis County, and the city of East St. Louis. The needs in these areas included quality education, social services, affordable housing, and especially economic development. Other needs identified in the area included:

- Affordable housing
- Micro lending, or lending with a principal of less than \$50,000
- Small business development and counseling
- Identifying and providing funding for small businesses
- Financial literacy education
- Mortgage lending targeted to low- and moderate-income borrowers

Scope of Evaluation in St. Louis MMSA

The St. Louis MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. LOUIS MMSA

LENDING TEST

The bank's performance under the Lending Test in the St. Louis MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the St. Louis MMSA was good. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
St. Louis MMSA	8,792	29,709	347	2	38,850	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				1	1	0.00	
Total	8,792	29,709	347	3	38,851	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
St. Louis MMSA	2,362,276	336,571	3,705	23,549	2,726,101	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				7	7		
Total	2,362,276	336,571	3,705	23,556	2,726,108	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 30th among 83 depository financial institutions placing it in the top 37 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked 39th among 633 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were DAS Acquisition Company (4.5 percent), U.S. Bank (4.1 percent), and Guild Mortgage Company (3.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 16.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 145 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (18.5 percent), U.S. Bank (14.6 percent), and Bank of America (7.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 22.5 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 26 small farm lenders in the AA. The other top lenders were John Deere Financial (14.3 percent), Carrollton Bank (12.8 percent), and U.S. Bank (12.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was well below the percentage of owner-occupied homes in those geographies but was equal to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the St. Louis MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 St. Louis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of middle-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the St. Louis MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$23.5 million, which represented 37.2 percent of the allocated tier 1 capital. By dollar volume, 100 percent funded revitalization and stabilization efforts. Of the total CD loans, one loan was a PPP loan totaling \$8.8 million to provide relief for an organization due to the COVID-19 pandemic. The other CD loan made during the evaluation period was a \$14.8 million loan to help revitalize and stabilize a moderate-income tract.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 467 loans in the amount of \$85.9 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	88	12,173
Federal Housing Administration (FHA)	34	6,257
Chase Homebuyer Grant Loans	54	10,542
Homebuyer Education Grants	39	20
Home Lending SPCP	45	7,307
Community Lending Program (Correspondent SPCP)	57	11,437
Veteran's Administration (VA)	18	4,605
VA Purchase Closing Credit	8	2,352
Business Card SPCP	31	108
Business Banking SPCP	6	312
Small Business Administration (SBA)	4	415
Paycheck Protection Program (PPP)	83	30,394
Total	467	85,922

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test conclusion for the St. Louis MMSA.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered a \$6,690 CD loan in the broader statewide or regional area that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA.

INVESTMENT TEST

The bank's performance under the Investment Test in the St. Louis MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the St. Louis MMSA was excellent. Investments in the broader statewide or regional areas supported the Investment Test conclusion.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 35.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made seven grants and donations, totaling \$1.1 million to four organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
St. Louis MMSA	13	8,377	8	14,268	21	91.3	22,645	94.9	0	0
Broader Statewide/Regional Area										
Indirect Benefit	1	123	1	1,086	2	8.7	1,209	5.1	0	0
Total	14	8,500	9	15,354	23	100.0	23,854	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 95.4 percent of investments supported affordable housing, 4 percent funded community services to low- and moderate-income individuals, and 0.7 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made a LIHTC investment totaling \$13.2 million that supported 200 affordable units.

Qualified investments made during the evaluation period include:

- Four grants totaling \$500,000 to a nonprofit organization that supported youth employment. The funds expand the organization's career accelerator project that provided low- and moderate-income youth with extensive training and skill-building workshops, virtual work-based learning experiences, and unique professional development opportunities. In addition, the funds provided partial salary support for 21 youth participants.
- A \$250,000 grant to a not-for-profit organization for its COVID Small Business Support program. The funding was used to enhance technical assistance services for small businesses looking to apply for and receive PPP loan forgiveness.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the St. Louis MMSA. Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$1.2 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. The investments facilitated the development of affordable housing.

SERVICE TEST

The bank's performance under the Service Test in the St. Louis MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the St. Louis MMSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
St. Louis MMSA	100.0	25	100.0	8.0	16.0	28.0	48.0	0.0	7.2	18.6	38.7	35.1	0.4
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered eight branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which three were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. JPMCB had 91 deposit-taking ATMs in the AA, of which 7.7 percent were in low-income geographies and 19.8 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
St. Louis MMSA	23	0	2	6	5	10	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 23 branches, of which two were in low-income geographies and six were in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and generally from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the St. Louis MMSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for 1,114 qualified CD service activities to 27 organizations, for a total of 3,527 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by three bank employees spending 356 hours participating on boards and committees for three different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and homebuyer education service types.

Service activities during the evaluation period include:

- A JPMCB employee provided 250 hours serving on the board of a nonprofit community development organization targeting under-resourced communities in the AA. The organization's work spans several key impact areas that are essential for thriving families and communities. They

include housing, education, health, employment, and economic development that provided housing, economic development, and educational services to under-resourced communities.

- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education to 717 individuals. These services were responsive to the need to improve financial health for underserved populations.

Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)

CRA rating for the Charlotte MMSA¹⁰: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Charlotte MMSA

The Charlotte MMSA was comprised of a majority of the Charlotte-Concord-Gastonia, NC-SC (Charlotte) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Charlotte MMSA is JPMCB's 34th largest rating area. As of June 30, 2023, the bank had approximately \$680 million in deposits in the Charlotte MMSA, of which approximately \$617.7 million represented retail branch deposits. As of December 31, 2023, the bank operated 19 branches and 68 deposit taking ATMs in the area, representing 0.4 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$3 billion in loans, or 0.5 percent of total bank loan originations and purchases, in the Charlotte MMSA during the evaluation period.

According to FDIC Deposit Market Share Data as of June 30, 2023, there were 44 FDIC-insured institutions operating 433 branches in the AA. JPMCB ranked 13th in deposit market share with 0.2 percent. Primary competitors include Bank of America with 62.6 percent market share, Truist Bank with 21.2 percent, and Wells Fargo Bank with 10.1 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Charlotte MMSA for each analysis period.

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

Table A – Demographic Information of the Assessment Area Assessment Area: Charlotte MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	466	8.4	24.5	32.0	34.1	1.1
Population by Geography	2,007,034	7.0	22.4	33.1	37.0	0.4
Housing Units by Geography	819,855	7.2	23.1	33.3	36.2	0.1
Owner-Occupied Units by Geography	483,716	2.9	17.8	36.3	42.9	0.0
Occupied Rental Units by Geography	264,323	14.0	31.4	28.2	26.2	0.2
Vacant Units by Geography	71,816	11.2	28.5	32.1	28.0	0.2
Businesses by Geography	233,872	6.6	17.7	28.3	46.7	0.6
Farms by Geography	5,067	4.4	16.1	43.8	35.5	0.2
Family Distribution by Income Level	502,999	21.8	16.6	18.6	43.0	0.0
Household Distribution by Income Level	748,039	22.8	15.9	17.3	43.9	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$191,226
			Families Below Poverty Level			11.0%
			Median Gross Rent			\$908
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Charlotte MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	586	5.3	26.3	31.9	34.5	2.0
Population by Geography	2,276,279	4.2	25.0	33.1	36.9	0.8
Housing Units by Geography	898,734	4.6	26.4	32.7	35.4	1.0
Owner-Occupied Units by Geography	535,829	2.2	21.3	34.9	41.3	0.4
Occupied Rental Units by Geography	293,997	8.4	34.5	29.4	25.7	1.9
Vacant Units by Geography	68,908	7.0	30.7	29.7	30.5	2.1
Businesses by Geography	378,702	4.4	22.7	28.4	42.6	1.9
Farms by Geography	7,704	2.8	23.9	38.8	33.7	0.7
Family Distribution by Income Level	549,793	20.3	17.4	19.4	42.9	0.0
Household Distribution by Income Level	829,826	21.9	16.6	17.8	43.7	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Charlotte MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value			\$249,675
			Median Gross Rent			\$1,122
			Families Below Poverty Level			7.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Charlotte MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Charlotte MMSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Charlotte MMSA would be \$1,027 using 2015 ACS data and \$1,340 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment exceeding \$802 according to 2015 ACS data and \$1,006 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,284 according to 2015 ACS data and \$1,610 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 62.2 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Charlotte MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Charlotte MMSA, 11 percent of families had incomes below the FPL according to the 2015 ACS and 7.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Charlotte MMSA was 3.1 percent compared to 3.2 percent for the state of North Carolina, 3.1 percent for the state of South Carolina, and 3.5 percent nationally.

Economic Data

Employment growth in the Charlotte MSA reaccelerated and was running at nearly double the regional and national pace. Healthcare and leisure/hospitality industries were leading job growth. The unemployment rate was at an all-time low even as labor force growth surged. The decline in house

prices was more modest than nationally and was replaced with small price gains. Single-family home permitting significantly recovered as builders looked to take advantage of exceedingly low inventories. Housing prices remained high. The area saw an increasing tech presence that attracted new workers and business investment. The area had low living and business costs with favorable demographic trends including a highly skilled work force.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on areas such as affordable housing, community revitalization and small business and economic development. Contacts noted that many low- and moderate-income individuals and small businesses have difficulty accessing credit. There is a need for financial education to help these groups gain access to affordable credit products. Contacts also noted that there are numerous areas of Charlotte that are in need of development and revitalization and there is a need to stimulate small business growth to support job creation. Other needs identified include:

- Affordable Mortgage Loans, including closing cost assistance
- Homeownership Counseling
- Financial Literacy Programming
- Financing and technical assistance for small businesses

Contacts indicated that there are opportunities for area financial institutions to provide funding support and technical assistance for these areas of need.

Scope of Evaluation in Charlotte MMSA

The Charlotte MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE MMSA

LENDING TEST

The bank's performance under the Lending Test in the Charlotte MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Charlotte MMSA	6,410	23,089	187	5	29,691	100.0	100.0

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Totals	6,410	23,089	187	5	29,691	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Charlotte MMSA	2,556,558	276,447	2,028	117,297	2,952,330	100.0	100.0
Totals	2,556,558	276,447	2,028	117,297	2,952,330	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.2 percent. The bank ranked 13th among 44 depository financial institutions placing it in the top 30 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked 30th among 778 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were Rocket Mortgage (7 percent), State Employees' Credit Union (6.3 percent), and Movement Mortgage (5.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 10.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 154 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (24 percent), Bank of America (12.2 percent), and Synchrony Bank (7.8 percent).

In overall small loans to farms for 2022, the bank had a market share of 19.6 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 26 small farm lenders in the AA, which placed it in the top 8 percent of lenders. The other top lenders were John Deere Financial (21 percent), First Citizens Bank and Trust (13.9 percent), and Wells Fargo (12.5 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and was well below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Charlotte MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made five CD loans totaling \$117.3 million, which represented 183.7 percent of the allocated tier 1 capital. By dollar volume, 77.1 percent funded revitalization and stabilization efforts, and 22.9 percent of these loans funded affordable housing. Of the total CD loans, the bank made one PPP loan totaling \$1.1 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period included:

Two loans totaling \$10.5 million to develop an 84-unit senior apartment complex. The project provides 49 units to households earning 60 percent or less of the AMI and 35 units of the units restricted to households earning 80 percent or less of the AMI.

A \$16.3 million loan to fund the construction of two separate condominium developments, one of which is a 106-unit development. The project will include 71 units restricted to households earning between 30 to 60 percent of the AMI and 35 units restricted to households earning 80 percent or less of the AMI.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 831 loans in the amount of \$183.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	109	21,767
Federal Housing Administration (FHA)	21	5,665
Chase Homebuyer Grant Loans	81	19,874
Homebuyer Education Grants	52	26
Home Lending SPCP	70	22,063
Community Lending Program (Correspondent SPCP)	241	76,292
Veteran's Administration (VA)	5	2,713
VA Purchase Closing Credit	1	310
Business Card SPCP	87	301
Business Banking SPCP	17	1,355
Paycheck Protection Program (PPP)	147	33,335
Total	831	183,701

INVESTMENT TEST

The bank's performance under the Investment Test in the Charlotte MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Number and Amount of Qualified Investments

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

current- and prior-period investments represented 53.2 percent of allocated tier 1 capital. Of the total qualified investments, the bank made eight grants and donations, totaling \$1.9 million to four organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Charlotte MMSA	3	1,129	15	32,862	18	100.0	33,991	100.0	0	0
Total	3	1,129	15	32,862	18	100.0	33,991	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 95.4 percent of investments supported affordable housing, 4.3 percent funded community services to low- and moderate-income individuals, and 0.3 percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made seven LIHTC investment totaling \$30.9 million that supported 601 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$26.4 million LIHTC investment to fund a project that provided 198 housing units for low- and moderate-income households. The development consisted of 11 three-story residential buildings intended for households earning 60 percent or less of the area median income.
- Three grants totaling \$750,000 to a university to support a career and post-graduation readiness program. The majority of the school's students come from low- or moderate-income families. The program provides skill-based training and post-graduate job placement to students interested in financial services.

SERVICE TEST

The bank's performance under the Service Test in the Charlotte MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Charlotte MMSA	100.0	19	100.0	0.0	21.1	21.1	52.6	5.3	4.2	25.0	33.1	36.9	0.8
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners considered the impact of the 2020 Census changes, which included the loss of one branch from the bank's low-income distribution resulting from the redesignation of a low-income geography to a moderate-income designation. There was no net change in the bank's moderate-income branch distribution resulting from the 2020 Census changes, since the one branch geography that was redesignated to moderate-income was offset by another branch geography that was reclassified from moderate-income to no income designation. Examiners further considered six branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. The branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 68 deposit-taking ATMs in the AA, of which none were in low-income geographies and 20.6 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Charlotte MMSA	19	0	1	4	5	9	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened 19 branches, of which one was in a low-income geography and four were in moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and

moderate-income individuals. JPMCB offered traditional banking products and services at all branches locations in the AA. Business hours were Monday through Friday from 9:00 a.m. to 5:00 p.m. and Saturday from 9:00 a.m. to 1:00 or 2:00 p.m. None of the branch locations offered drive-thru services.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Charlotte MMSA.

Bank records showed that employees provided their financial or job-specific expertise and/or technical assistance for total of 875 qualified CD service activities to 24 organizations, for a total of 1,763 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, and economic development to low- and moderate-income individuals, families, and geographies. Leadership was evident by two bank employees spending over 73 hours participating on boards and committees for two different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial education for the underserved populations.

Service activities during the evaluation period include:

- JPMCB employees provided 434 hours of community service to a nonprofit that provided hands-on curriculum programs to students from low- and moderate-income families. Services included educational and literacy programs, and leadership development.
- JPMCB employees provided school readiness assistance totaling 265 hours to low- and moderate-income students. These programs help students develop the skills needed to achieve future educational success. Services included educational and literacy programs, and work development.

Kansas City-Overland Park-Kansas City, MO-KS CSA (Kansas City CSA)

CRA rating for the Kansas City CSA¹¹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Kansas City CSA

The Kansas City MMSA was comprised of a portion of the Kansas City, MO-KS (Kansas City) MSA and the entire Ottawa, KS MiSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Kansas City CSA is JPMCB's 39th largest rating area. As of June 30, 2023, the bank had approximately \$397.2 million in deposits in the Kansas City CSA, of which approximately \$383.1 million represent retail branch deposits. As of December 31, 2023, the bank operated 18 branches and 69 deposit-taking ATMs in the area, representing 0.4 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$1.8 billion in loans, or 0.3 percent of total bank loan originations and purchases, in the Kansas City CSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 99 FDIC-insured institutions operating 580 branches in the AA. JPMCB ranked 28th in deposit market share with 0.5 percent. Primary competitors include UMB Bank, N.A. with 29.7 percent deposit market share, Commerce Bank with 12.6 percent, and Bank of America with 7 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Kansas City CSA for each period.

¹¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	496	15.7	22.0	31.5	27.0	3.8
Population by Geography	1,891,502	9.5	21.2	36.7	32.3	0.3
Housing Units by Geography	811,375	11.2	22.4	37.0	28.9	0.5
Owner-Occupied Units by Geography	481,115	6.0	17.4	38.7	37.8	0.2
Occupied Rental Units by Geography	257,542	16.6	30.0	36.0	16.7	0.7
Vacant Units by Geography	72,718	26.9	28.5	29.0	13.8	1.9
Businesses by Geography	170,225	7.2	18.4	34.0	38.5	1.9
Farms by Geography	4,775	4.9	15.2	41.2	38.3	0.4
Family Distribution by Income Level	477,413	21.1	17.4	20.3	41.3	0.0
Household Distribution by Income Level	738,657	23.4	16.6	17.6	42.4	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$163,264
Median Family Income Non-MSAs - KS		\$57,229	Median Gross Rent			\$858
			Families Below Poverty Level			9.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	565	9.9	24.4	35.0	26.4	4.2
Population by Geography	2,024,376	7.1	23.7	38.0	30.5	0.7
Housing Units by Geography	847,362	8.0	25.2	38.4	27.6	0.9
Owner-Occupied Units by Geography	505,456	4.4	19.8	40.9	34.5	0.4
Occupied Rental Units by Geography	276,094	12.5	32.6	35.9	17.6	1.4
Vacant Units by Geography	65,812	16.4	35.9	28.8	16.6	2.2
Businesses by Geography	300,033	5.7	23.1	34.4	34.3	2.6
Farms by Geography	8,021	4.1	19.4	43.5	32.1	0.9
Family Distribution by Income Level	499,080	20.1	17.4	21.7	40.8	0.0
Household Distribution by Income Level	781,550	23.5	16.2	18.1	42.2	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Kansas City CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$86,562	Median Housing Value			\$204,091
Median Family Income Non-MSAs - KS		\$65,467	Median Gross Rent			\$1,005
			Families Below Poverty Level			6.9%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Kansas City CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Kansas City CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Kansas City CSA would be \$876 using 2015 ACS data and \$1,096 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment ranging from \$715 to \$908 according to 2015 ACS data and from \$818 to \$1,082 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,145 to \$1,452 according to 2015 ACS data and ranging from \$1,309 to \$1,731 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 48.2 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Kansas City CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Kansas City CSA, 9.1 percent of families had incomes below the FPL according to the 2015 ACS and 6.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Kansas City CSA was 2.5 percent compared to 4.2 percent for the state of Illinois, 2 percent for the state of Kansas, and 3.5 percent nationally.

Economic Data

The economy in the Kansas City MSA slowed, driven by declines in manufacturing. The unemployment rate increased, in part due to increases in labor force participation. Health care remained a job creator. Single-family house prices held up in the area. The metro area had better migration trends than regional

peers of a similar size even though the Kansas City area was less affordable. Elevated borrowing costs reduced demand for housing. The share of active listings with a price reduction reached its highest on record. The area had a well-developed transportation and distribution network, an educated workforce with above average per capita income, and below average cost of doing business. The area's high dependence on a declining telecommunications industry and suburban sprawl limited growth in the downtown central business district.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations serving the Kansas City CSA. These organizations focus on affordable housing, community and economic development, and community services. Contacts noted that rent costs are high and many low-income households are housing cost burdened paying more than 50 percent of their income towards housing costs. The area has seen an influx of market rate housing developments that are unaffordable for low- and moderate-income households. Many low-income households do not have access to traditional financial services due to a lack of bank branches in underserved urban communities and instead utilize check cashing services through grocery stores and payday lenders. Many residents of these neighborhoods also lack broadband connectivity and/or access to devices that would allow them to utilize mobile banking services. Contacts also noted that the southeastern portion of the AA has the highest poverty rates in the CSA, with this area suffering from disinvestment and a poor education system that has created a skills gap that prevents people from attaining living-wage jobs. Contacts noted numerous needs in the community including:

- Affordable rental housing, including housing for low-income seniors and disabled individuals
- Small dollar mortgage and personal loans
- Downpayment assistance programs for first time home buyers
- Financing for home repairs
- Small Business lending
- Homelessness prevention and support services
- Financial Literacy Programs
- Lower cost bank accounts
- Credit Counseling and Education Programs

Contacts noted that the area is served by several organizations that offer potential partnership opportunities that would allow financial institutions to support the needs of low and moderate-income individuals and communities.

Scope of Evaluation in Kansas City CSA

The Kansas City CSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY CSA

LENDING TEST

The bank's performance under the Lending Test in the Kansas City CSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Kansas City CSA was good.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Kansas City CSA	4,741	26,779	424	8	31,952	100.0	100.0
Totals	4,741	26,779	424	8	31,952	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of CSA Loans	% of CSA Deposits
Full-Scope							
Kansas City CSA	1,324,899	302,643	4,061	131,265	1,762,868	100.0	100.0
Totals	1,324,899	302,643	4,061	131,265	1,762,868	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 28th among 99 depository financial institutions placing it in the top 29 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked 45th among 651 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were Community America Credit Union (9.4 percent), Fairway Independent Mortgage Corp (5.1 percent), and Rocket Mortgage (4.6 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 161 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (21.1 percent), U.S. Bank (10.5 percent), and Bank of America (8.1 percent).

In overall small loans to farms for 2022, the bank had a market share of 21.7 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 37 small farm lenders in the AA which placed it in the top 3 percent of lenders. The other top lenders were John Deere Financial (19.4 percent), Hawthorn Bank (12.9 percent), and U.S. Bank (8.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of lending in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the Kansas City CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The bank's percentage of small loans to farm in moderate-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 Kansas City CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Kansas City CSA section of appendix D for the facts and data used to evaluate

the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made eight CD loans totaling \$131.3 million, which represented 331.4 percent of the allocated tier 1 capital. By dollar volume, 84 percent funded community services targeted to low- and moderate-income individuals and 16 percent of these loans funded affordable housing.

CD loans made during the evaluation period included:

- An \$86.9 million term loan to a local school district to refund a portion of an outstanding general obligation bond. According to the National Center for Educational Statistics (NCES), over 72 percent of the district's student body was eligible for the Federal Free or Reduced Lunch Program.
- Three loans totaling over \$8.6 million to convert a vacant building into 44 units of rental housing. Thirty-four units will be restricted to seniors aged 55 and above with incomes of 30 to 60 percent of the AMI.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 378 loans in the amount of 63.5 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	69	10,783
Federal Housing Administration (FHA)	16	3,271
Chase Homebuyer Grant Loans	64	13,701
Homebuyer Education Grants	34	17
Home Lending SPCP	18	2,333
Community Lending Program (Correspondent SPCP)	57	9,936

Loan Type	Number of Loans	Dollar Amount (\$000s)
Veteran's Administration (VA)	12	5,108
VA Purchase Closing Credit	9	3,927
Business Card SPCP	17	62
Business Banking SPCP	6	470
Paycheck Protection Program (PPP)	76	13,878
Total	378	63,486

INVESTMENT TEST

The bank's performance under the Investment Test in the Kansas City CSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Kansas City CSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 104.4 percent of allocated tier 1 capital. Of the total qualified investments, the bank made five grants and donations, totaling \$630,000 to five organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Kansas City CSA	12	13,613	14	27,750	26	100.0	41,363	100.0	0	0
Total	12	13,613	14	27,750	26	100.0	41,363	100.0	0	0
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 94.3 percent of investments supported affordable housing, 3.2 supported revitalization and stabilization efforts, 1.8 percent funded community services to low- and moderate-income individuals, and 0.7 percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made nine LIHTC investments totaling \$27.1 million that supported 594 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$13.7 million LIHTC investment to renovate a 16-building, 204-unit, affordable housing complex. The renovations included upgraded plumbing, heating, and cooling systems. All units were restricted to individuals or families earning less than 60 percent of the area median income.

- A \$175,000 donation to a local nonprofit economic development organization focused on under-represented individuals. The organization offered programs that provided mentorship, financial services, legal services, strategic planning, and other technical services related to small business needs.

SERVICE TEST

The bank's performance under the Service Test in the Kansas City CSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in Kansas City CSA was good.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Kansas City CSA	100.0	18	100.0	0.0	27.8	22.2	44.4	5.6	7.1	23.7	38.0	30.5	0.7
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered five branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 69 deposit-taking ATMs in the AA, of which 31.9 percent were in moderate-income geographies. The bank did not have any ATMs in low-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Kansas City CSA	17	0	0	7	3	7	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. JPMCB opened 17 branches, of which seven were in moderate-income geographies. JPMCB did not close any branches in the Kansas City CSA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Kansas City CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 908 qualified CD service activities to 23 organizations, for a total of 1,380 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by three bank employees spending over 149 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- A JPMCB employee provided 34 hours of service as a board member and finance chair of a nonprofit organization focused on violence prevention and youth development in underserved communities. Programs included assistance to recently incarcerated individuals, career coaching for low- and moderate-income youths, financial aid for struggling families, and housing assistance for marginalized individuals and families.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education classes attended by 820 individuals. These services were responsive to the needs of the CSA to improve financial health for underserved populations.

Wheeling, WV-OH MMSA (Wheeling MMSA)

CRA rating for the Wheeling MMSA¹²: 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:

- The bank's origination and purchase of home mortgage loans and small loans to businesses had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Wheeling MMSA

The Wheeling MMSA was comprised of the entire Wheeling, WV-OH (Wheeling) MMSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Wheeling MMSA is JPMCB's 43rd largest rating area. As of June 30, 2023, the bank had approximately \$243.5 million in deposits in the Wheeling MMSA, of which approximately \$226.4 million represent retail branch deposits. As of December 31, 2023, the bank operated two branches and two deposit taking ATMs in the area, representing less than 0.1 percent of total branches and less than 0.1 percent of total ATMs. The bank originated and purchased approximately \$42.7 million in loans, or less than 0.1 percent of total bank loan originations and purchases, in the Wheeling MMSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 14 FDIC-insured institutions operating 50 branches in the AA. JPMCB ranked ninth in deposit market share with 4.4 percent. Primary competitors include Wesbanco Bank, Inc. with 43.3 percent market share, United Bank with 9.3 percent, and Main Street Bank Corp. with 7.2 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Wheeling MMSA AA for each period.

¹² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Wheeling MMSA 2020-2021						
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	9,719	0.0	20.8	58.3	20.9	0.0
Farms by Geography	327	0.0	9.5	66.7	23.9	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 MSA - 48540 Wheeling, WV-OH MSA		\$56,853	Median Housing Value			\$98,597
			Families Below Poverty Level			9.3%
			Median Gross Rent			\$558
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Wheeling MMSA 2022- 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	2.0	28.0	48.0	20.0	2.0
Population by Geography	139,513	1.1	18.3	57.9	22.1	0.7
Housing Units by Geography	68,834	1.0	20.8	58.7	18.3	1.2
Owner-Occupied Units by Geography	41,245	1.2	17.3	60.2	20.8	0.5
Occupied Rental Units by Geography	14,131	1.1	28.5	49.7	17.6	3.0
Vacant Units by Geography	13,458	0.5	23.2	63.4	11.5	1.4
Businesses by Geography	12,837	0.6	26.3	44.2	27.9	1.1
Farms by Geography	480	1.5	14.6	59.0	24.6	0.4
Family Distribution by Income Level	34,435	20.9	17.3	20.6	41.3	0.0
Household Distribution by Income Level	55,376	25.4	15.0	17.2	42.3	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Wheeling MMSA 2022- 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$65,607	Median Housing Value			\$119,286
			Families Below Poverty Level			9.3%
			Median Gross Rent			\$643
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Wheeling MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Wheeling MMSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Wheeling MMSA would be \$529 using 2015 ACS data and \$640 using 2020 Census data.

In the Wheeling MMSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$711 according to 2015 ACS data and \$820 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,137 according to 2015 ACS data and \$1,312 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 29.5 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Wheeling MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Wheeling MMSA, 9.3 percent of families had incomes below the FPL according to the 2015 ACS and 9.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Wheeling MMSA was 4.3 percent compared to 3.1 percent for the state of Ohio, 4 percent for the state of West Virginia, and the national unemployment rate of 3.5 percent.

Economic Data

The Wheeling MSA economy underperformed. Employment remained well below its pre-pandemic level and was falling. Employment in manufacturing and government declined, while healthcare and

mining/construction, which were the main drivers of the area's economy did not add many jobs. Healthcare employment remained significantly below 2019 level due to the closures of Ohio Valley Medical Center and the East Ohio Regional Hospital prior to the pandemic. The unemployment rate was lower than before the pandemic driven by labor force declines since 2020. The population in the area has declined for 25 consecutive years and further losses are expected as deaths exceed births and as out-migration persists due to limited job opportunities outside of the energy industry. The area's strengths include abundant natural energy resources, high housing affordability, and below-average business and living costs. Weaknesses included a lack of industrial diversity that left the local economy exposed to boom-and-bust energy cycles, low educational attainment of the workforce, and a declining and rapidly aging population.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on economic and community development. In addition, a review was conducted of a community needs assessment completed by local community-based organizations in the area. Needs identified include:

- Affordable housing
- Access to mental health services
- Access to affordable childcare
- Services for persons experiencing homelessness
- Living wage employment
- Access to credit for small businesses

Scope of Evaluation in Wheeling MMSA

The Wheeling MMSA received a full-scope review. The bank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis. Conclusions in the Lending Test are based solely on home mortgage and small business lending. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WHEELING MMSA

LENDING TEST

The bank's performance under the Lending Test in the Wheeling MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Wheeling MMSA was excellent.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Wheeling MMSA	174	752	21	1	948	100.0	100.0
Totals	174	752	21	1	948	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Wheeling MMSA	22,362	11,405	242	8,651	42,660	100.0	100.0
Totals	22,362	11,405	242	8,651	42,660	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 4.4 percent. The bank ranked ninth among 14 depository financial institutions placing it in the top 65 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 22nd among 145 home mortgage lenders in the AA, which placed it in the top 16 percent of lenders. The top three lenders were Wesbanco Bank (12.2 percent), Main Street Bank (8.5 percent), and Belmont Savings Bank (8.4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 13.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 50 small business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (26.7 percent), Synchrony Bank (11.7 percent), and Capital One (10.1 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in its AA. During the 2020 through 2021 analysis period, there were no low-income geographies in the bank's AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate

distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and below the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was stronger than the performance in 2022 through 2023 due to a higher percentage of lending in moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was weaker than performance in 2022 through 2023 due to a lower percentage of lending in moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans and small loans to businesses, including summary reports and maps, did not identify any unexplained conspicuous lending gaps in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers approximated the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of low-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Testing conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$8.7 million, which represented 37 percent of the allocated tier 1 capital. This was a PPP loan that supported revitalization and stabilization efforts and provided relief for an organization due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 72 loans in the amount of \$14.4 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	12	941
Federal Housing Administration (FHA)	5	699
Chase Homebuyer Grant Loans	5	500
Homebuyer Education Grants	7	4
Paycheck Protection Program (PPP)	43	12,305
Total	72	14,449

INVESTMENT TEST

The bank's performance under the Investment Test in the Wheeling MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Wheeling MMSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, but not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 22.4 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Wheeling MMSA	4	624	2	4,626	6	100.0	5,250	100.0	0	0
Total	4	624	2	4,626	6	100.0	5,250	100.0	0	0

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

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two investments both of which were LIHTC investments that supported affordable housing. Qualified investments made during the evaluation period included a \$3 million LIHTC investment in a property as part of a LIHTC multi-investor housing fund. The property will support 104 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the Wheeling MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Wheeling MMSA was good.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Wheeling MMSA	100.0	2	100.0	0.0	50.0	0.0	50.0	0.0	1.1	18.3	57.9	22.1	0.7
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in a low-income geography. The bank's branch distribution in a moderate-income geography exceeded the percentage of the population living within the geography.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. Bank had two deposit-taking ATMs in the AA, of which none were in low-income geographies, and one was in a moderate-income geography. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a neutral impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Wheeling MMSA	1	1	0	1	-1	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's record of 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. While the bank relocated a branch from a middle-income geography to a moderate-income geography, this occurred in the last month of the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. There was one location with a drive-thru facility operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity to conduct specific activities in the Wheeling MMSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total of 135 qualified CD service activities to 19 organizations for a total of 166 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy workshops and homebuyer education.

Service activities during the evaluation period include:

- The bank partnered with a financial education organization that provides down payment assistance and financial education resources to underserved communities. The bank sponsored 40 financial education seminars attended by 333 individuals. These seminars provided education on financial stability such as savings methods, budgeting, consumer rights, and the value of money.
- JPMCB provided homebuyer education trainings, totaling 22 hours, attended by seven individuals. These services were responsive to the need for homeownership education for low-income communities within the MMSA.

Allentown-Bethlehem-Easton, PA-NJ MMSA (Allentown MMSA)

CRA rating for the Allentown MMSA¹³: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that were adequately responsive to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Allentown MMSA

The Allentown MMSA was comprised of a majority of the Allentown-Bethlehem-Easton, PA-NJ (Allentown) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Allentown MMSA is JPMCB's 42nd largest rating area. As of June 30, 2023, the bank had approximately \$242.5 million in deposits in the Allentown MMSA, of which approximately \$237.5 million represent retail branch deposits. As of December 31, 2023, the bank operated five branches and 11 deposit-taking ATMs in the area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$432,493 in loans, or 0.1 percent of total bank loan originations and purchases, in the Allentown MMSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 28 FDIC-insured institutions operating 173 branches in the AA. JPMCB ranked 21st in deposit market share with 1.2 percent. Primary competitors include Wells Fargo Bank with 19.5 percent deposit market share, PNC Bank with 12.1 percent, and Truist Bank with 10.9 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Allentown MMSA for each analysis period.

¹³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Allentown MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	9.0	18.6	41.9	30.5	0.0
Population by Geography	763,598	7.8	18.5	38.2	35.6	0.0
Housing Units by Geography	309,576	7.4	18.3	40.1	34.2	0.0
Owner-Occupied Units by Geography	200,363	2.8	12.9	41.5	42.7	0.0
Occupied Rental Units by Geography	88,191	15.7	29.2	38.1	17.0	0.0
Vacant Units by Geography	21,022	16.0	24.7	34.6	24.6	0.0
Businesses by Geography	77,396	7.1	15.9	37.1	39.9	0.0
Farms by Geography	2,290	1.8	7.1	42.5	48.6	0.0
Family Distribution by Income Level	197,132	20.1	17.6	20.9	41.3	0.0
Household Distribution by Income Level	288,554	23.1	15.9	18.6	42.4	0.0
Median Family Income MSA - 10900 Allentown- Bethlehem-Easton, PA-NJ MSA		\$71,539	Median Housing Value			\$200,424
			Median Gross Rent			\$956
			Families Below Poverty Level			8.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Allentown MMSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	7.9	20.8	40.4	30.9	0.0
Population by Geography	797,140	7.0	19.5	38.8	34.7	0.0
Housing Units by Geography	315,803	6.0	20.3	40.4	33.3	0.0
Owner-Occupied Units by Geography	203,575	2.4	13.4	42.5	41.7	0.0
Occupied Rental Units by Geography	94,119	13.0	33.4	36.9	16.7	0.0
Vacant Units by Geography	18,109	10.7	29.5	34.6	25.1	0.0
Businesses by Geography	95,398	6.6	19.2	36.4	37.8	0.0
Farms by Geography	2,737	1.2	8.6	42.7	47.6	0.0
Family Distribution by Income Level	201,092	20.0	17.7	20.9	41.4	0.0
Household Distribution by Income Level	297,694	23.4	15.9	18.0	42.6	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Allentown MMSA 2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 10900 Allentown- Bethlehem-Easton, PA-NJ MSA		\$84,676	Median Housing Value			\$219,312
			Median Gross Rent			\$1,116
			Families Below Poverty Level			7.2%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Allentown MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Allentown MMSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Allentown MMSA would be \$1,076 using 2015 ACS data and \$1,177 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment exceeding \$894 according to 2015 ACS data and \$1,058 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,431 according to 2015 ACS data and \$1,694 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 52.6 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Allentown MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Allentown MMSA, 8 percent of families had incomes below the FPL according to the 2015 ACS and 7.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Allentown MMSA was 3.3 percent compared to 4.5 percent for New Jersey, 2.9 percent for the state of Pennsylvania, and 3.5 percent nationally.

Economic Data

The Allentown MSA's economy gained some momentum in recent months, making it one of the stronger performers in Pennsylvania. Nonfarm payroll growth picked up, fueled by robust gains in healthcare and secondary industries such as professional/business services, despite losses in the key

manufacturing and logistics industries. The unemployment rate dropped even as the labor force expands, indicating the job market is quickly absorbing workers. The area's population had a below-average share of working-age adults and below-average educational attainment, negatives for healthcare and other industries requiring advanced education. The area's strengths include its proximity to east coast ports and densely populated metro areas, a high concentration of essential commodity production, and below-average costs of living and doing business. Weaknesses included unfavorable age dynamics and above average employment volatility relative to the U.S.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on small business and economic development, affordable housing, and community and social services for low-income individuals and families. Contacts noted that there have been significant increases in rent prices in the area due in part to gentrification. This has led to an increase in evictions and the number of individuals and families facing homelessness. Increases in housing and home heating costs have led to a surge in demand for access to food pantries and food banks. The housing stock in the area is older. There is a need for affordable weatherization programs that will allow homeowners to update their properties and help offset high heating costs. Contacts also noted that many small businesses struggled with making rent payments during the height of the COVID-19 pandemic. Many businesses are in arrears on rent payments by thousands of dollars and will have difficulty repaying these funds without assistance. Other needs identified include:

- Support for free legal services for households facing eviction
- Funding to create more food banks/food pantries to meet growing demand
- Financial education programs for small businesses
- Funding to support downpayment assistance and closing costs for first time homebuyers
- Affordable rental housing
- Funding to support weatherization programs for homeowners
- Funding for nonprofit organizations to offset organization and staff costs that impede the ability to provide services

Scope of Evaluation in Allentown MMSA

The Allentown MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALLENTOWN MMSA

LENDING TEST

The bank's performance under the Lending Test in the Allentown MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Allentown MMSA was good.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Allentown MMSA	1,549	6,313	110	1	7,973	100.0	100.0
Totals	1,549	6,313	110	1	7,973	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Allentown MMSA	350,867	78,242	1,106	2,278	432,493	100.0	100.0
Totals	350,867	78,242	1,106	2,278	432,493	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.2 percent. The bank ranked 21st among 28 depository financial institutions placing it in the top 75 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 31st among 515 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were Rocket Mortgage (5.6 percent), PNC Bank (4 percent), and First Commonwealth Federal Credit Union (4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 10.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 104 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (22.1 percent), Synchrony Bank (7.6 percent), and Capital One (7.6 percent).

In overall small loans to farms for 2022, the bank had a market share of 25.6 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 14 small farm lenders in the AA, which placed it in the top 15 percent of lenders. The other top lenders were U.S. Bank (29.6 percent), John Deere Financial (10.4 percent), and Capital One (9.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies but was below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and was near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Small Loans to Farms

Refer to Table S in the Allentown MSA 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to the bank not originating or purchasing any smalls loans to farm in low- or moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Allentown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending levels did not have a significant impact on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$2.3 million, which represented 9.3 percent of the allocated tier 1 capital. This was a PPP loan that supported revitalization and stabilization efforts and provided relief for an organization due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 223 loans in the amount of \$32.6 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	46	7,215
Federal Housing Administration (FHA)	10	2,059
Chase Homebuyer Grant	34	5,977
Homebuyer Education Grants	22	11
Home Lending SPCP	8	1,538
Community Lending Program (Correspondent SPCP)	1	240
Veteran's Administration (VA)	2	576
VA Purchase Closing Credit	1	281
Business Card SPCP	7	43
Business Banking SPCP	2	108
Small Business Administration (SBA)	3	525
Paycheck Protection Program (PPP)	87	14,048
Total	223	32,621

INVESTMENT TEST

The bank's performance under the Investment Test in the Allentown MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Allentown MMSA was good.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, although not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current-

and prior-period investments represented 20.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants and donations, totaling \$15,000 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Allentown MMSA	1	4,923	2	15	3	100.0	4,938	100.0	0	0
Total	1	4,923	2	15	3	100.0	4,938	100.0	0	0
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and community economic development needs. By dollar volume, 99.7 percent of investments supported affordable housing and 0.3 percent supported community services to low- and moderate-income individuals.

During this evaluation period, the bank did not use innovative and/or complex investments to support CD initiatives. Qualified investments made during the evaluation period included a \$10,000 grant to a nonprofit community service organization. The organization provides a HUD-approved housing counseling program that assists primarily low- and moderate-income individuals in the AA. The organization helps consumers with obtaining homeownership or rental assistance. It also assists those facing homelessness and homeowners in need of foreclosure assistance. The bank also had one prior-period LIHTC with an outstanding balance of \$4.9 million that provided 61 units of affordable housing to low- and moderate-income senior citizens.

SERVICE TEST

The bank's performance under the Service Test in the Allentown MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Allentown MMSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Allentown MMSA	100.0	5	100.0	20.0	40.0	20.0	20.0	0.0	7.0	19.5	38.8	34.7	0.0
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low- and in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 11 deposit-taking ATMs in the AA, of which 18.2 percent were in low-income geographies and 45.5 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Allentown MMSA	3	0	1	1	0	1	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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 opened three branches, of which one was in a low-income geography, and one was in a moderate-income geography. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There was one location with a drive-thru facility operating under similar hours.

Community Development Services

JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Allentown MMSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 380 qualified CD service activities to 18 organizations for a total of 522 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by three bank employees spending over 72 hours participating on boards and committees for three different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- A JPMCB employee provided 54 hours serving on the board of a nonprofit community development organization focusing on manufacturing. Programs include redeveloping vacant and underutilized industrial sites, incubating businesses and cultivating the entrepreneurial ecosystem, and deploying economic development financing programs to drive business growth and physical improvement of the city's manufacturing buildings.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education to 342 individuals. These services were responsive to the need to improve financial health for underserved populations within the MMSA.

Omaha-Council Bluffs, NE-IA MMSA (Omaha MMSA)

CRA rating for the Omaha MMSA¹⁴: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in Omaha MMSA

The Omaha MMSA was comprised of a portion of the Omaha-Council Bluffs, NE-IA (Omaha) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The Omaha MMSA is JPMCB's 48th largest rating area. As of June 30, 2023, the bank had approximately \$101.2 million in deposits in the Omaha MMSA, of which approximately \$93.2 million represented retail branch deposits. As of December 31, 2023, the bank operated seven branches and 25 deposit taking ATMs in the area, representing 0.1 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$384,019 in loans, or 0.1 percent of total bank loan originations and purchases, in the Omaha MMSA during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 47 FDIC-insured institutions operating 226 branches in the AA. JPMCB ranked 29th in deposit market share with 0.3 percent. Primary competitors include First National Bank of Omaha with 40.1 percent deposit market share, Wells Fargo Bank with 9.3 percent, and U.S. Bank with 9 percent.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Omaha MMSA for each analysis period.

¹⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area Assessment Area: Omaha MMSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	229	13.1	23.1	38.0	25.8	0.0
Population by Geography	800,060	9.8	22.4	38.6	29.1	0.0
Housing Units by Geography	329,464	10.3	23.1	40.4	26.2	0.0
Owner-Occupied Units by Geography	197,463	5.2	19.7	40.5	34.5	0.0
Occupied Rental Units by Geography	109,744	16.7	28.4	41.4	13.4	0.0
Vacant Units by Geography	22,257	23.0	26.8	34.3	16.0	0.0
Businesses by Geography	66,993	6.9	16.5	42.9	33.7	0.0
Farms by Geography	2,710	3.2	10.4	49.5	36.8	0.0
Family Distribution by Income Level	199,434	21.0	17.8	21.1	40.1	0.0
Household Distribution by Income Level	307,207	23.7	16.8	18.2	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$151,805
			Families Below Poverty Level			9.0%
			Median Gross Rent			\$831
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Omaha MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	240	7.1	27.5	37.1	28.3	0.0
Population by Geography	868,797	5.0	24.7	37.3	33.0	0.0
Housing Units by Geography	347,052	4.9	26.0	40.1	29.0	0.0
Owner-Occupied Units by Geography	209,200	2.8	20.1	40.8	36.3	0.0
Occupied Rental Units by Geography	116,425	8.0	35.1	39.1	17.9	0.0
Vacant Units by Geography	21,427	9.8	34.1	38.2	17.9	0.0
Businesses by Geography	103,254	3.9	19.7	38.5	38.0	0.0
Farms by Geography	3,640	2.4	13.0	47.9	36.6	0.0
Family Distribution by Income Level	208,600	19.5	18.3	22.6	39.6	0.0
Household Distribution by Income Level	325,625	23.3	16.6	18.8	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA	\$87,733		Median Housing Value			\$188,899

Table A – Demographic Information of the Assessment Area Assessment Area: Omaha MMSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
			Families Below Poverty Level			6.3%
			Median Gross Rent			\$975
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Omaha MMSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income.

In the Omaha MMSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data. The monthly mortgage payment for the median home in the Omaha MMSA would be \$815 using 2015 ACS data and \$1,014 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment exceeding \$920 according to 2015 ACS data and \$1,097 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,473 according to 2015 ACS data and \$1,755 according to 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 43 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Omaha MMSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Omaha MMSA, 9 percent of families had incomes below the FPL according to the 2015 ACS and 6.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Omaha MMSA was 2.4 percent compared to 2.7 percent for the state of Iowa, 2.2 percent for the state of Nebraska, and 3.5 percent nationally.

Economic Data

The labor market in the Omaha MSA lost momentum in recent months. Healthcare and construction pushed forward, but payrolls in industries ranging from finance and government to retail and manufacturing remained stable or declined slightly. The unemployment rate remained below its pre-pandemic level but increased recently while the labor force steadily contracted. The area was a major logistics hub due to its central location, extensive rail network, and proximity to major interstate routes such as I-80. For years, the area's population has grown faster than Nebraska's and the nation's, with

Omaha among the top 25 fastest growing Midwest metro areas in 2022. Due to an outsized young adult population, natural population growth is robust. Single-family housing prices continued to increase, although more slowly than the national average. The Omaha MSA's strengths included low costs, a skilled workforce, upbeat population growth, high-wage management jobs, above-average labor force participation, high housing affordability, and below average employment volatility. Weaknesses included a tight labor market and a below average role for high technology.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on educational services, affordable housing, economic development, and supporting small businesses. Contacts noted that the area has a high demand for labor, however, there is a shortage of qualified workers for some jobs. While unemployment in the area is generally low, some areas, such as North Omaha, which has a high African American population, have a high unemployment rate due to a skills gap. Generally, businesses were able to withstand the COVID-19 pandemic due in part to shorter shutdowns compared to the rest of the country. The area did see an increase in the number of entrepreneurs who started their own businesses during the pandemic, particularly among small businesses in the eastern part of the area. Contacts also noted that the agricultural sector has experienced an increase in investors purchasing local farmlands, driving up prices. The area has a growing population which is driving a need to make financial services information available. Other needs identified in the area include:

- Affordable Housing with on-site supportive services
- Small business and small farm loans
- Access to affordable childcare
- Grants and educational programming to help nonprofit organizations build capacity

Scope of Evaluation in Omaha MMSA

The Omaha MMSA received a full-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OMAHA MMSA

LENDING TEST

The bank's performance under the Lending Test in the Omaha MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Omaha MMSA was good.

Conclusions for Area Receiving a Full-Scope Review

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Omaha MMSA	1,025	9,449	139	1	10,613	100.0	100.0
Totals	1,025	9,449	139	1	10,613	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of MMSA Loans	% of MMSA Deposits
Full-Scope							
Omaha MMSA	261,168	108,704	1,511	12,636	384,019	100.0	100.0
Totals	261,168	108,704	1,511	12,636	384,019	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.3 percent. The bank ranked 29th among 47 depository financial institutions placing it in the top 62 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 51st among 384 home mortgage lenders in the AA, which placed it in the top 14 percent of lenders. The top three lenders were First National Bank of Omaha (11.1 percent), Veridian Credit Union (6.5 percent), and Centris Federal Credit Union (5.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 17.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 86 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (21.4 percent), U.S. Bank (10.4 percent), and Capital One (9.1 percent).

In overall small loans to farms for 2022, the bank had a market share of 12.8 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 20 small farm lenders in the AA, which placed it in the top 20 percent of lenders. The top three lenders were John Deere Financial (25.8 percent), American National Bank (16.9 percent), and U.S. Bank (16.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to better distributions of lending in both low- and moderate-income geographies.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due a lower distribution of lending in low-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Omaha MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Testing conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$12.6 million, which represented 131.2 percent of the allocated tier 1 capital. This was an affordable housing loan for the acquisition and renovation of a multifamily apartment complex in a moderate-income tract. The property consists of 204 units, all of which are affordable to low- and moderate-income households.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 93 loans in the amount of \$11.9 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	19	3,005
Federal Housing Administration (FHA)	10	2,245
Chase Homebuyer Grant Loans	21	3,494
Homebuyer Education Grants	14	7
Home Lending SPCP	5	675
Community Lending Program (Correspondent SPCP)	3	493
Business Card SPCP	6	19
Paycheck Protection Program (PPP)	15	1,996
Total	93	11,934

INVESTMENT TEST

The bank's performance under the Investment Test in the Omaha MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Omaha MMSA was excellent.

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 379.5 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Omaha CSA	2	308	16	36,256	18	100.0	36,564	100.0	0	0
Total	2	308	16	36,256	18	100.0	36,564	100.0	0	0
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 16 LIHTC investments totaling \$36.3 million that supported 714 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$12.9 LIHTC investment to develop a 111-unit, mixed-income housing development. A third of the units will be replacement housings for residents of an outdated public housing complex and a third will be affordable housing.
- A \$3 million LIHTC investment in a housing fund that supported a housing development in Douglas County. The bank's investment supported 45 units of affordable housing for low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in the Omaha MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Omaha MMSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Omaha MMSA	100.0	7	100.0	0.0	28.6	28.6	42.9	0.0	5.0	24.7	37.3	33.0	0.0
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The Omaha MMSA was impacted by 2020 Census changes. A low-income tract, where a branch is located, changed to a moderate-income, and a moderate-income tract, where another branch is located, changed to a middle-income tract. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered two branches in middle- or upper-income geographies that serve residents of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, online banking, and mobile banking options. The bank had 25 deposit-taking ATMs in the AA, of which none were in low-income geographies and 36 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Omaha MMSA	7	0	1	2	1	3	0
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened seven branches, of which one was in a low-income geography and two were in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Omaha MMSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total 323 qualified CD service activities to 17 organizations for a total of 372 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with community services.

Service activities during the evaluation period include:

- JPMCB employees partnered with the local chapter of a nationwide affordably housing organization to provide 24 hours of technical assistance training. The classes focused on understanding the organizations capacity and improving communication of their needs. This allowed the organization to generate more income and enable them to serve more clients.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education attended by 291 individuals.

State Ratings

State of Alabama

CRA rating for the state of Alabama: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Alabama

Examiners assessed performance in three AAs within the state of Alabama rating area. These were comprised of the entire Auburn-Opelika (Auburn) MSA and portions of the Birmingham-Hoover (Birmingham) and Tuscaloosa MSAs. The bank entered the Huntsville-Decatur, AL CSA AA after July 1, 2023. Examiners did not review performance in this AA as there was not enough activity to conduct a meaningful analysis. Refer to appendix A for a complete listing of the counties that comprise each AA.

The state of Alabama is JPMCB's 45th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$160 million in deposits in the state of Alabama, of which approximately \$156.4 million represent retail branch deposits. As of December 31, 2023, the bank operated seven branches and 20 deposit taking ATMs in the area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$563.3 million in loans, or 0.1 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 51 banks operating 311 branches in the state rating area. JPMCB ranked 28th in deposit market share with 0.3 percent. Primary competitors include Regions Bank with 32.9 percent market share, PNC Bank with 12.7 percent, and Wells Fargo Bank with 8.8 percent.

Auburn MSA

The Auburn MSA AA consists of Lee County. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 19 banks operating 42 branches in the AA. JPMCB operated one branch and ranked 13th in deposit market share with 2.5 percent. Primary competitors in the AA include Auburnbank with 20.8 percent deposit market share, Southstate Bank, N.A. with 10.1 percent, and Regions Bank with 7.8 percent. As of December 31, 2023, the bank operated two deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Auburn MSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Auburn MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.7
Population by Geography	150,982	2.4	21.4	62.7	11.3	2.2
Housing Units by Geography	64,964	2.5	20.3	62.4	11.0	3.7
Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.5
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.5
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.5
Businesses by Geography	9,351	1.5	32.3	53.4	11.6	1.1
Farms by Geography	280	1.1	18.6	66.4	13.9	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.0
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		\$61,141	Median Housing Value			\$156,485
			Median Gross Rent			\$788
			Families Below Poverty Level			14.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Auburn MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	4.2	25.0	37.5	20.8	12.5
Population by Geography	174,241	3.6	20.2	46.3	21.4	8.5
Housing Units by Geography	70,256	4.1	22.0	45.7	20.8	7.3
Owner-Occupied Units by Geography	38,483	2.3	21.3	48.4	25.2	2.8

Table A – Demographic Information of the Assessment Area Assessment Area: Auburn MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	22,248	6.7	21.7	44.7	15.2	11.7
Vacant Units by Geography	9,525	5.5	25.4	37.3	16.6	15.3
Businesses by Geography	15,358	2.1	20.0	42.6	27.0	8.3
Farms by Geography	467	3.0	21.6	42.0	28.9	4.5
Family Distribution by Income Level	37,681	23.5	15.5	19.7	41.2	0.0
Household Distribution by Income Level	60,731	28.9	13.5	14.0	43.6	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		\$75,091	Median Housing Value			\$169,421
			Median Gross Rent			\$861
			Families Below Poverty Level			10.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Auburn MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Auburn MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2015 ACS data.

In the Auburn MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$764 according to 2015 ACS data and \$939 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,223 according to 2015 ACS data and \$1,502 according to 2020 Census data. The monthly mortgage payment for the median home in the Auburn MSA would be \$840 using 2015 ACS data and \$909 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 44.6 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Auburn MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Auburn MSA, 14.3 percent of families had incomes below the FPL according to the 2015 ACS and 10.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Auburn MSA was 2.4 percent compared to 2.6 percent for the state of Alabama and 3.5 percent nationally.

Economic Data

The Auburn MSA has fully recouped job losses resulting from the COVID-19 pandemic. The jobless rate was below Alabama's and the nation's and inched lower even as the labor force rises to historic highs. Manufacturing slowed but remained a key driver. The area had a transportation heavy factory cluster, with vehicle equipment production accounting for about one-fifth of local factory jobs. The area is home to Auburn University, which saw significant increases in applications and placed demand at an all-time high. As a college town, the share of residents with a bachelor's degree exceeded 40 percent. Population growth in the area exceeded that of both the state of Alabama and national averages. The area's strengths include the presence of Auburn University, which helped foster growth of private businesses, a well-educated workforce, strong manufacturing industry, low costs, and affordable housing. Weaknesses included an overreliance on state government, below-average per capita income, and a volatile migration pattern.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on economic development, affordable housing, and community development. Contacts noted that the area has experienced rapid growth leading to an increased demand for housing. Many low-income households are cost burdened due to increasing rents and a lack of affordable housing. They also noted that the increase in enrollment at Auburn University has created a need for more student housing. Needs identified in the community include:

- Affordable Housing
- Mortgage downpayment and closing cost assistance
- Access to transportation services
- Youth and family supportive services
- Job readiness training

Scope of Evaluation in State of Alabama

Examiners selected the Auburn MSA for full-scope review, as it represented the largest concentration of deposits in the state of Alabama. The MSA accounts for 71.6 percent of the bank's adjusted deposits and 14 percent of lending in the state. The Birmingham and Tuscaloosa MSAs received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in any AA in Alabama to conduct a meaningful analysis. Conclusions in the Lending Test are based solely on home mortgage and small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank's performance under the Lending Test in the state of Alabama is rated High Satisfactory. Performance in the limited-scope AAs supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Auburn MSA	177	1,278	22	0	1,477	14.0	70.0
Limited-Scope							
Birmingham MSA	1,032	6,480	64	0	7,576	71.6	17.5
Tuscaloosa MSA	438	1,070	17	1	1,526	14.4	12.5
Total	1,647	8,828	103	1	10,579	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Auburn MSA	39,999	14,402	255	0	54,656	9.7	70.0
Limited-Scope							
Birmingham MSA	295,291	75,167	607	0	371,065	65.8	17.5
Tuscaloosa MSA	125,112	11,785	129	1,064	138,090	24.5	12.5
Total	460,402	101,354	991	1,064	563,811	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 2.5 percent. The bank ranked 13th among 19 depository financial institutions placing it in the top 68 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked 44th among 279 home mortgage lenders in the AA, which placed it in the top 16 percent of lenders. The top three lenders were River Bank & Trust (6.8 percent), Trustmark National Bank (6.4 percent), and CMG Mortgage (6 percent).

In overall small loans to businesses for 2022, the bank had a market share of 13.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 61 small

business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (26.6 percent), Capital One (8 percent), and Synchrony Bank (6.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Alabama 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank did not originate or purchase any home mortgage loans in low-income geographies. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Alabama 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans and small loans to businesses, including summary reports and maps, did not identify any unexplained conspicuous lending gaps in the AA.

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded percentage of moderate-income families and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Auburn MSA. Due to limited bank presence and opportunities, CD lending had a neutral effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made little use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, a total of 14 loans in the amount of \$1.2 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
Chase Homebuyer Grant Loans	3	834
Veteran's Administration (VA)	1	335
Paycheck Protection Program (PPP)	10	847
Total	14	1,182

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tuscaloosa MSA was consistent with the bank's performance in the full-scope area. Performance in the Birmingham MSA was weaker than the bank's performance in the full-scope area due to poorer geographic distributions of bank lending. Performance in the limited-scope AAs supported the bank's overall performance under the Lending Test.

Refer to Tables O through T in the state of Alabama 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 Alabama is rated Outstanding. Performance in the limited-scope AAs and investments in broader statewide or regional areas supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 78.9 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Auburn MSA	0	0	1	9,129	1	2.4	9,129	7.0	0	0
Limited-Scope										
Birmingham MSA	1	3,914	0	0	1	2.4	3,914	3.0	0	0
Tuscaloosa MSA	3	10,591	0	0	3	7.3	10,591	8.1	0	0
Broader Statewide/Regional Area										
Direct Benefit	3	2,616	2	10,926	5	12.2	13,542	10.4	0	0
Indirect Benefit	21	24,817	10	68,057	31	75.6	92,873	71.4	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Total	28	41,938	13	88,111	41	100.0	130,049	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supported affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one \$9.1 million LIHTC investment in a project to construct a 56-unit affordable housing development targeted senior adults. The development included two residential buildings and a clubhouse with all units restricted to households with incomes below 60 percent of the AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Birmingham and Tuscaloosa MSAs was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the bank's overall performance under the Investment Test.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Alabama. The bank made five investments totaling \$13.5 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$92.9 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included 30 LIHTC supporting 2,195 affordable units and one NMTC investment.

SERVICE TEST

The bank's performance under the Service Test in the state of Alabama is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Alabama.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Auburn MSA	70.0	1	14.3	0.0	0.0	0.0	0.0	100.0	3.6	20.2	46.3	21.4	8.5
Limited-Scope													
Birmingham MSA	17.5	5	71.4	20.0	20.0	20.0	40.0	0.0	7.3	20.0	32.8	38.4	1.5
Tuscaloosa MSA	12.5	1	14.3	0.0	0.0	100.0	0.0	0.0	6.2	10.5	45.5	33.6	4.3
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank had only one branch located in an unassigned-income geography. This branch is located within 1,000 feet of a moderate-income geography and served residents of the geography which supported the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had two deposit-taking ATMs in the AA, neither of which was in a low- or moderate-income geography. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA *
Full-Scope							
Auburn MSA	0	0	0	0	0	0	0
Limited-Scope							
Birmingham MSA	5	0	0	1	1	2	1
Tuscaloosa MSA	1	0	0	0	0	0	1
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

The bank did not open or close branches during the evaluation period in the Auburn MSA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB operated one branch in the AA that offered traditional banking products and services. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Auburn MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 69 qualified CD service activities to 20 organizations, for a total of 91 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, technical training, and technical assistance.

Service activities during the evaluation period include:

- Four bank employees provided 14 hours of technical training to staff of a nonprofit organization on topics including affordable mortgage products, prevention of fraud, scams, and other financial exploitation targeted to low- and moderate-income persons.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education to 40 low- and moderate-income individuals. These services were responsive to the need to improve financial health for underserved populations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Service Test in the Birmingham MSA was stronger than the bank's performance in the full-scope area due to better branch distributions in low- and moderate-income geographies. Performance in the Tuscaloosa MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the bank's overall performance under the Lending Test.

State of Arizona

CRA rating for the state of Arizona: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall adequate level of qualified investments, grants, and donations that exhibited excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Arizona

Examiners assessed performance in eight AAs in the state of Arizona rating area. These were comprised of the entire Phoenix-Mesa, AZ (Phoenix) CSA, Flagstaff, AZ (Flagstaff) MSA, Lake Havasu City-Kingman, AZ (Lake Havasu) MSA, Prescott Valley-Prescott, AZ (Prescott Valley) MSA, Sierra Vista-Douglas, AZ (Sierra Vista) MSA, Tucson-Nogles, AZ (Tucson) CSA, and Yuma, AZ (Yuma) MSA and three counties in the non-MSA Arizona AA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Arizona is JPMCB's seventh largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$53.8 billion in deposits in the state of Arizona rating area, of which approximately \$50.3 billion represent retail branch deposits. As of December 31, 2023, the bank operated 190 branches and 552 deposit-taking ATMs in the rating area, representing 3.9 percent of total branches and 3.5 percent of total ATMs. The bank originated and purchased approximately \$18.3 billion in loans, or 2.9 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 62 banks operating 977 branches in the state rating area. JPMCB ranked first in deposit market share with 25.8 percent. Primary competitors include Wells Fargo Bank with 19.3 percent deposit market share, Bank of America with 17 percent, and Western Alliance Bank with 15 percent.

Phoenix CSA

The Phoenix CSA AA consists of Gila, Maricopa, and Pinal counties. According to FDIC Deposit Market Share Data as of June 30, 2023, there were 57 banks operating 684 branches in the AA. JPMCB operated 133 branches in the AA and ranked first in deposit market share with 25.4 percent. Primary competitors include Bank of America, N.A with 18 percent deposit market share, Wells Fargo Bank with 17.9 percent, and Western Alliance Bank with 17.6 percent. As of December 31, 2023, the bank operated 388 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Phoenix CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,007	10.9	23.1	33.5	31.2	1.3
Population by Geography	4,461,080	10.5	23.4	34.1	31.7	0.3
Housing Units by Geography	1,864,997	9.2	23.6	36.1	31.0	0.1
Owner-Occupied Units by Geography	982,687	4.4	19.4	37.7	38.5	0.0
Occupied Rental Units by Geography	608,339	16.5	29.5	32.9	20.8	0.2
Vacant Units by Geography	273,971	10.2	25.4	37.4	26.9	0.1
Businesses by Geography	830,004	6.8	15.4	31.2	46.1	0.5
Farms by Geography	13,970	7.0	19.4	31.8	41.6	0.3
Family Distribution by Income Level	1,050,219	21.9	17.3	19.5	41.3	0.0
Household Distribution by Income Level	1,591,026	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			\$196,678
Median Family Income Non-MSAs - AZ		\$44,368	Median Gross Rent			\$988
			Families Below Poverty Level			12.5%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Phoenix CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,120	6.1	26.5	33.1	32.0	2.3
Population by Geography	4,899,104	5.6	25.8	34.7	33.2	0.7
Housing Units by Geography	1,977,527	5.1	26.9	35.5	32.1	0.4
Owner-Occupied Units by Geography	1,140,344	2.5	21.5	37.0	38.8	0.2
Occupied Rental Units by Geography	627,398	9.8	35.8	32.4	21.4	0.7
Vacant Units by Geography	209,785	4.9	29.8	36.9	27.9	0.5
Businesses by Geography	1,099,611	3.9	18.5	29.9	47.2	0.5
Farms by Geography	19,180	4.2	21.5	32.7	40.9	0.7
Family Distribution by Income Level	1,167,957	20.6	18.3	20.3	40.9	0.0
Household Distribution by Income Level	1,767,742	22.6	17.0	18.6	41.8	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$78,930	Median Housing Value			\$281,042
Median Family Income Non-MSAs - AZ		\$50,964	Median Gross Rent			\$1,206
			Families Below Poverty Level			9.1%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Phoenix CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Phoenix CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

The monthly mortgage payment for the median home in the Phoenix CSA would be \$1,056 using 2015 ACS data and \$1,509 using 2020 Census data. Low-income borrowers would be challenged to afford a mortgage payment ranging from \$555 to \$796 according to 2015 ACS data and from \$637 to \$987 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$887 to \$1,274 according to 2015 ACS data and ranging from \$1,019 to \$1,579 according to 2020 Census data, depending on what portion of the CSA they reside in.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 61.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Phoenix CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Phoenix CSA, 12.5 percent of families had incomes below the FPL according to the 2015 ACS and 9.1 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Phoenix CSA was 3.4 percent compared to the state of Arizona at 3.8 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Phoenix area maintained its lead over the region. The area's strengths included robust population growth and in-migration, a hub for expansion and relocation of banks, insurance companies, and business service firms, and lower business costs than California. Weaknesses included average wages well-below those of other western states and high cyclicalities due to dependence on investment and population inflows. Job gains were broad-based, though there were a few standout performers. Phoenix added manufacturing and leisure/hospital jobs at twice the national rate over the last six months. The unemployment rate increased due to increased labor force participation. Finally, the housing market is beginning to cool along with that of the region and nation. House prices declined in recent months and residential permit issuance fell in lockstep. Phoenix remained more affordable than comparably sized metro areas in the region.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, economic development, and social services. Contacts noted the impact of the COVID-19 pandemic as well as record high temperatures due to climate change on vulnerable members of the community, including low-income households, seniors, and communities of color. Contacts noted that in 2020 the area experienced a record high number of days with extreme heat. Many low-income households struggle to afford the cost of cooling their homes which puts them at increased risk of heat related illness or death. Credit and community development needs identified for the area include:

- Access to affordable housing
- Rental assistance for low and moderate-income households
- Support for households facing food insecurity
- Access to mental health/substance use disorder treatment
- Access to affordable childcare
- Support for workforce development programs
- Home Rehabilitation Loans
- Micro-loans for consumers and small businesses

The area is served by several nonprofit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in State of Arizona

Examiners selected the Phoenix CSA for full-scope review, as it represented the largest concentration of deposits and branches in the state of Arizona. The CSA accounts for 79.3 percent of the bank's adjusted deposits, and 78.7 percent of lending in the state. The Flagstaff, Lake Havasu, Prescott Valley, Sierra Vista, Tucson, and Yuma MSAs and non-MSA Arizona AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Flagstaff or Lake Havasu MSAs to conduct a meaningful analysis. Conclusions in the Lending Test for those AAs are based solely on home mortgage and small business lending.

There were no low-income geographies in the Lake Havasu or Prescott Valley MSAs. There were no low-income geographies in the Yuma MSA during the 2020 through 2021 analysis period or the Sierra Vista MSA during the 2022 through 2023 analysis period. Geographic conclusions were based solely on performance in moderate-income geographies in those AAs for these review periods.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Phoenix CSA	33,820	113,992	816	103	148,731	78.7	79.3
Limited-Scope							
Flagstaff MSA	719	2,379	26	5	3,129	1.7	0.9
Lake Havasu MSA	1,021	2,473	18	0	3,512	1.9	2.4
Prescott Valley MSA	1,423	5,136	79	1	6,639	3.5	3.3
Sierra Vista MSA	292	837	52	1	1,182	0.6	0.6
Tucson CSA	5,732	16,129	128	30	22,019	11.6	11.0
Yuma MSA	472	1,349	62	0	1,883	1.0	1.4
Non-MSA AZ	400	1,514	57	3	1,974	1.0	1.2
Total	43,879	143,809	1,238	143	189,069	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Phoenix CSA	11,907,219	2,507,321	13,417	339,371	14,767,328	80.5	79.3
Limited-Scope							
Flagstaff MSA	350,492	54,297	259	58,525	463,573	2.6	0.9
Lake Havasu MSA	243,423	56,071	199	0	299,693	1.7	2.4
Prescott Valley MSA	435,179	111,127	984	82	547,372	3.0	3.3
Sierra Vista MSA	49,208	16,804	548	3,304	69,864	0.4	0.6
Tucson CSA	1,548,372	361,242	1,523	43,641	1,954,778	10.7	11.0
Yuma MSA	77,243	24,330	1,294	0	102,867	0.6	1.4
Non-MSA AZ	93,617	33,607	743	87	128,054	0.6	1.2
Total	14,704,753	3,164,799	18,967	445,010	18,333,529	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 25.4 percent. The bank ranked first among 57 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 1.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked ninth among 972 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders were United Wholesale Mortgage (8.5 percent), Rocket Mortgage (6.6 percent), and Desert Financial Credit Union (5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 24.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 215 small business lenders in the AA. The other top lenders were American Express (21.8 percent), Bank of America (9.7 percent), and Citibank (8.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 38.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 33 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (24.8 percent), U.S. Bank (9.4 percent), and John Deere Financial (7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to better distributions of lending in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Arizona 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due a lower distribution of small loans to farms with gross annual revenues of \$1 million or less.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Testing conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 103 CD loans totaling \$339.4 million, which represented 8.2 percent of the allocated tier 1 capital. By dollar volume, 70.9 percent of these loans funded affordable housing, 23.9 percent funded revitalization and stabilization efforts, and 4.9 percent funded community services targeted to low- and moderate-income individuals and 0.3 percent funding economic development. Of the total CD loans, the bank made 86 PPP loans totaling \$81.8 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$48 million construction loan to support the development of 296 low- and moderate-income units. Of these units, 285 are rent restricted to households with incomes of 60 percent or less of the AMI.
- A \$1.4 million construction loan to fund the development and construction of a health clinic. The clinic is located in a census tract that qualifies for NMTCs and is considered severely distressed based on median income and poverty rate.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 16,563 loans in the amount of \$1.9 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	1,436	258,680
Federal Housing Administration (FHA)	123	34,541
Chase Homebuyer Grant Loans	630	158,548
Homebuyer Education Grants	346	173
Home Lending SPCP	176	59,348
Community Lending Program (Correspondent SPCP)	87	26,274
Veteran's Administration (VA)	43	16,822
VA Purchase Closing Credit	17	6,803

Loan Type	Number of Loans	Dollar Amount (\$000s)
Business Card SPCP	180	697
Business Banking SPCP	92	10,401
Small Business Administration (SBA)	153	59,213
Paycheck Protection Program (PPP)	13,280	1,292,403
Total	16,563	1,923,903

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Flagstaff MSA and Sierra Vista MSA was consistent with the bank's performance in the full-scope area. Performance in the Lake Havasu MSA, Yuma MSA, and the non-MSA Arizona AA was weaker than the bank's performance in the full-scope area due to lower geographic distributions of loans in low- and moderate-income geographies and lower levels of CD lending activities. Performance in the Prescott MSA was weaker than the bank's performance in the full-scope area due to a lower level of CD lending activity. Performance in the Tucson CSA was weaker than the bank's performance in the full-scope area due to lower geographic distributions of loans in low- and moderate-income geographies. The bank's performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion for the state of Arizona.

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 Outstanding. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a neutral impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 16.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 14 grants and donations, totaling \$4.8 million to 10 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Phoenix CSA	37	48,160	38	648,168	75	70.5	696,328	89.9	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Limited-Scope										
Flagstaff MSA	0	0	1	21,985	1	1.0	21,985	2.8	0	0
Lake Havasu MSA	2	212	0	0	2	1.9	212	0.0	0	0
Prescott Valley MSA	1	481	1	463	2	1.9	943	0.1	0	0
Sierra Vista MSA	1	659	0	0	1	1.0	659	0.1	0	0
Tucson CSA	3	12,673	9	20,318	12	11.4	32,991	4.3	0	0
Yuma MSA	2	551	1	18,745	3	2.9	19,296	2.5	0	0
Non-MSA AZ	3	754	0	0	3	2.9	754	0.1	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	7	1,568	7	6.7	1,568	0.2	0	0
Total	49	63,490	57	711,247	106	100.0	774,736	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 67.6 percent supported revitalization and stabilization efforts, 32.1 percent of investments supported affordable housing, and 0.3 percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one renewable energy investment totaling \$500.2 million and eight LIHTC investments totaling \$106 million that supported 730 affordable housing units. Additionally, the bank made three NMTC investments totaling \$16.6 million.

Qualified investments made during the evaluation period include:

- A \$500.2 million renewable energy investment in a moderate-income area. The investment created hundreds of construction jobs, 30 permanent positions, and will bring additional property tax revenues to the project area, supporting local school districts and other essential community services. The investment involved multiple stakeholders, including banks, investors, and various government entities.
- A \$5.7 million NMTC equity investment to develop a health clinic in an underserved tribal community. This new clinic will serve approximately 3,600 persons and includes a family health care, pharmacy, wellness center, nutritionist, and imaging center. The project will create temporary construction and permanent jobs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Flagstaff and Yuma MSAs were consistent with the bank's performance in the full-scope area. Performance in the

Lake Havasu MSA, Prescott Valley MSA, Sierra Vista MSA, Tucson CSA, and the non-MSA Arizona AA was weaker than performance in the full-scope AA due to a lower percentage of CD investments relative to allocated capital. The bank's performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion for the state of Arizona.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Arizona. The bank made seven donations or grants totaling \$1.6 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals and economic development.

SERVICE TEST

The bank's performance under the Service Test in the state of Arizona is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Arizona.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Phoenix CSA	79.3	133	70.0	4.5	17.3	26.3	50.4	1.5	5.6	25.8	34.7	33.2	0.7
Limited-Scope													
Flagstaff MSA	0.9	3	1.6	33.3	0.0	66.7	0.0	0.0	7.2	20.9	49.4	22.5	0.0
Lake Havasu MSA	2.4	6	3.2	0.0	0.0	83.3	16.7	0.0	0.0	14.2	59.9	24.2	1.7
Prescott Valley MSA	3.3	9	4.7	0.0	33.3	44.4	22.2	0.0	0.0	18.5	67.4	14.1	0.0
Sierra Vista MSA	0.6	1	0.5	0.0	0.0	100.0	0.0	0.0	0.0	19.6	54.6	24.1	1.6

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Tucson CSA	11.0	31	16.3	0.0	29.0	25.8	45.2	0.0	3.7	32.2	29.5	33.1	1.5
Yuma MSA	1.4	4	2.1	0.0	75.0	25.0	0.0	0.0	1.8	22.2	44.5	31.1	0.5
Non-MSA AZ	1.2	3	1.6	0.0	0.0	100.0	0.0	0.0	2.1	28.4	32.7	36.8	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low-income geographies was near to and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners further considered 36 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 22 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Phoenix CSA included three Community Branches, of which one was in a low-income geography and one in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 388 deposit-taking ATMs in the AA, of which 5.9 percent were in low-income geographies and 20.4 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Phoenix CSA	4	28	0	-3	-14	-7	0
Limited-Scope							
Flagstaff MSA	0	1	0	0	-1	0	0
Lake Havasu MSA	0	0	0	0	0	0	0
Prescott Valley MSA	0	2	0	0	-2	0	0
Sierra Vista MSA	0	1	0	0	-1	0	0
Tucson CSA	1	8	0	-4	0	-2	-1
Yuma MSA	0	0	0	0	0	0	0
Non-MSA AZ	0	1	0	0	-1	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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, none in low- or moderate-income geographies. The bank closed 28 branches, of which three were in moderate-income geographies. The branch closures were the result of reduced customer usage and the need to optimize market efficiency.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m., or 2:00 p.m. on Saturday. There were 108 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Phoenix CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 3,571 qualified CD service activities to 74 organizations for a total of 8,169 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by six bank employees spending 342 hours participating on boards and committees for seven different CD organizations. The bank's assistance was responsive to identified needs in the AA, particularly with financial literacy, homeownership and maintenance, and financial education.

Service activities during the evaluation period include:

- A bank employee dedicated 72 hours of board services to a local affiliate of a nationwide nonprofit economic development organization. The organization connects partners to resources and advances community-driven priorities in underserved communities. The organization has programs related to affordable housing, childcare and early learning, financial stability, small business development, and economic development.
- Four bank employees partnered with a local social services agency to provide 55 hours of financial literacy services that impacted 864 low- and moderate-income individuals. The organization has wide-ranging programs aimed at addressing the pressing needs of the community, including education, workforce development, family support, basic needs, and immigration.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Prescott Valley MSA and Yuma MSA was consistent with the bank's performance in the full-scope area. Performance in the Flagstaff MSA, Lake Havasu MSA, Sierra Vista MSA, Tucson CSA, and non-MSA Arizona was weaker than the bank's performance in the full-scope area due to a lower branch distribution percentage in low- and/or moderate-income geographies, with consideration for middle- and upper-income branches that serve low- and moderate-income geographies. Performance in the limited-scope AAs had a neutral impact on the bank's overall performance under the Service Test.

State of Arkansas

CRA rating for the state of Arkansas¹⁵: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- An overall excellent level of qualified investments and grants that demonstrated good responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Arkansas

Examiners assessed performance in two AAs in the state of Arkansas rating area. These were comprised of a portion of the Little Rock-North Little Rock-Conway (Little Rock) MSA and a majority of the Fayetteville-Springdale-Rogers (Fayetteville) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Arkansas is JPMCB's 46th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$150.3 million in deposits in the state of Arkansas, of which approximately \$131.5 million represent retail branch deposits. As of December 31, 2023, the bank operated eight branches and 25 deposit taking ATMs in the state, representing 0.2 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$446.5 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 51 banks operating 355 branches in the state rating area. JPMCB ranked 28th in deposit market share with 0.4 percent. Primary competitors include Arvest Bank with 20.3 percent deposit market share, Bank OZK with 18.0 percent, and Simmons Bank with 11.7 percent.

Little Rock MSA

The Little Rock MSA AA consists of Pulaski County. According to FDIC Deposit Market Share Data,

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.

as of June 30, 2023, there were 30 banks operating 171 branches in the AA. JPMCB operated 5 branches and ranked 20th in deposit market share. Primary competitors include Bank OZK with 26.8 percent deposit market share, Simmons Bank with 17.2 percent, and Bank of America with 15.3 percent. As of December 31, 2023, the bank operated 17 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Little Rock MSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Little Rock MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	10.5	30.5	25.3	31.6	2.1
Population by Geography	390,463	7.4	26.7	27.9	37.1	0.8
Housing Units by Geography	179,916	7.9	27.5	27.3	36.5	0.8
Owner-Occupied Units by Geography	92,876	4.4	22.4	29.8	42.9	0.5
Occupied Rental Units by Geography	61,364	10.8	32.6	24.4	30.9	1.2
Vacant Units by Geography	25,676	13.3	33.8	25.3	26.3	1.3
Businesses by Geography	35,554	6.5	23.1	21.4	48.7	0.3
Farms by Geography	859	3.0	18.7	28.4	49.8	0.0
Family Distribution by Income Level	92,874	23.8	17.1	18.2	40.9	0.0
Household Distribution by Income Level	154,240	26.9	16.3	17.6	39.2	0.0
Median Family Income MSA - 30780 Little Rock-North Little Rock-Conway, AR MSA		\$61,339	Median Housing Value			\$149,778
			Median Gross Rent			\$773
			Families Below Poverty Level			12.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Little Rock MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	107	13.1	27.1	32.7	25.2	1.9
Population by Geography	399,125	10.1	27.1	33.2	29.5	0.1
Housing Units by Geography	185,460	11.2	26.6	33.3	28.9	0.0
Owner-Occupied Units by Geography	93,882	6.1	21.8	35.2	36.9	0.0
Occupied Rental Units by Geography	67,770	15.6	31.9	30.8	21.8	0.0
Vacant Units by Geography	23,808	18.7	30.3	33.0	17.9	0.0
Businesses by Geography	52,007	7.8	22.6	29.1	40.0	0.5
Farms by Geography	1,297	5.7	20.8	30.2	43.2	0.1
Family Distribution by Income Level	95,195	25.2	15.7	18.5	40.5	0.0
Household Distribution by Income Level	161,652	26.1	17.4	16.4	40.2	0.0
Median Family Income MSA - 30780 Little Rock-North Little Rock-Conway, AR MSA		\$72,289	Median Housing Value			\$169,194
			Median Gross Rent			\$867
			Families Below Poverty Level			12.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Little Rock MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Little Rock MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Little Rock MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$767 according to 2015 ACS data and \$904 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,227 according to 2015 ACS data and \$1,446 according to 2020 Census data. The monthly mortgage payment for the median home in the Little Rock MSA would be \$804 using 2015 ACS data and \$908 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 40.8 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Little Rock MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Little Rock MSA, 12.3 percent of families had incomes below the

FPL according to the 2015 ACS and 12 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Little Rock MSA was 3.2 percent compared to 3.4 percent for the state of Arkansas and 3.5 percent nationally.

Economic Data

The Little Rock MSA's economy lost momentum. Weakness was concentrated in government and retail, while leisure/hospitality and construction have driven job gains. While the jobless rate increased as payrolls and the labor force contracted, it remained near record lows. Public-sector wage gains struggled to keep up with those in the private sector amid inflation and a competitive labor market. After 13 years of decline, enrollment at the University of Arkansas increased, largely due to its affordability advantage over other schools. In contrast with the national trends, the area experienced a decrease in its prime working-age population, making it difficult for firms in the metro area to attract employees and fill open positions. Monthly house price growth fell below that of the state and nation and permitting weakened. The area's strengths included well-developed infrastructure, serving as a regional healthcare hub, low business costs, housing affordability, and positive net migration. Weaknesses included few dynamic growth drivers, low incomes, and a high poverty rate.

Community Contacts

Examiner reviewed two community contacts completed during the evaluation period with organizations serving the AA. One of the contacts consisted of a listening session conducted with representatives of several area nonprofit organizations and local government entities. These organizations focus on economic development, small business, community development, youth services, social services, and housing. Contacts noted that workforce development is a major issue in the area. There is a lack of education around the types of opportunities that exist, especially within the immigrant community. There is a need for safe and affordable rental housing for low-income residents. Contacts indicated that the city of Little Rock is a major food desert and that many communities do not have access to high-speed internet. Other needs identified include:

- Micro loans for small businesses
- Downpayment and closing cost assistance for first time homebuyers
- Spanish language financial education programs
- Technical assistance and education for small businesses and prospective entrepreneurs
- Access to affordable basic medical services

Scope of Evaluation in State of Arkansas

Examiners selected the Little Rock MSA for full-scope review, as it represented the largest concentration of deposits and branches in the state of Arkansas. The MSA accounts for 86.2 percent of the bank's adjusted deposits, and 43.4 percent of lending in the state. The Fayetteville MSA received a limited-scope review. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Little Rock MSA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

The bank's performance under the Lending Test in the state of Arkansas is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Little Rock MSA	653	3,213	27	0	3,893	43.4	85.5
Limited-Scope							
Fayetteville MSA	748	4,249	87	0	5,084	56.6	14.6
Total	1,401	7,462	114	0	8,977	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Little Rock MSA	135,896	40,363	283	0	176,542	39.5	85.5
Limited-Scope							
Fayetteville MSA	221,773	47,099	1,139	0	270,011	60.5	14.6
Total	357,669	87,462	1,422	0	446,553	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 20th among 30 depository financial institutions placing it in the top 67 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 41st among 319 home mortgage lenders in the AA, which placed it in the top 13 percent of lenders. The top three lenders were Arkansas Federal Credit Union (8.7 percent), Arvest Bank (7.2 percent), and Simmons Bank (4.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 10.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 91 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (24.1 percent), Capital One (7.7 percent), and U.S. Bank (7.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 10.1 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 18 small farm lenders in the AA, which placed it in the top 23 percent of lenders. The top three lenders were Simmons Bank (18 percent), U.S. Bank (11.2 percent), and Capital One (11.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Arkansas 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through due to lower distributions of lending in both low- and middle-income geographies.

Small Loans to Businesses

Refer to Table Q in the Arkansas 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was consistent with, the performance in 2022 through 2023.

Lending Gap Analysis

A review of home mortgage loans and small loans to businesses, including summary reports and maps, did not identify any unexplained conspicuous lending gaps in the AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Little Rock MSA. Given the bank's limited presence and limited availability of projects in the AA, the lack of CD lending had a neutral effect on the Lending Test rating.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 63 loans in the amount of \$9.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	12	1,459
Federal Housing Administration (FHA)	6	1,081
Chase Homebuyer Grant Loans	4	556
Homebuyer Education Grants	7	4
Home Lending SPCP	5	670
Community Lending Program (Correspondent SPCP)	12	1,872
Veteran's Administration (VA)	1	153
Business Card SPCP	10	41
Paycheck Protection Program (PPP)	6	3,911
Total	63	9,747

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fayetteville MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall Lending Test conclusion.

Refer to Tables O through T in the state of Arkansas 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 Arkansas is rated Outstanding. Performance in the limited-scope AA and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had 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 dollar volume of current- and prior-period investments represented 111.3 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants, totaling \$16,400 to an organization.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Little Rock MSA	5	9,807	4	3,232	9	29.0	13,039	27.7	0	0
Limited-Scope										
Fayetteville MSA	1	1,197	4	16,734	5	16.1	17,931	38.0	0	0
Broader Statewide/Regional Area										
Indirect Benefit	14	8,868	3	7,309	17	54.8	16,177	34.3	0	0
Total	20	19,872	11	27,275	31	100.0	47,147	100.00	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.9 percent of investments supported affordable housing and 0.1 percent funded community services to low- and moderate-income individuals.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$2.8 million that created 85 affordable housing units. Qualified investments made during the evaluation period include a \$2.8 million investment in a LIHTC project located in a moderate-income census tract. The project constructs an 85-unit affordable housing development targeting senior adults. All units were restricted to households with incomes of 60 percent or less of the AMI.

Conclusions for Area Receiving a Limited-Scope Review

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

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Arkansas. Because the bank was responsive to CD needs and opportunities in its AA(s), examiners considered \$16.2 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included 15 LIHTCs that supported 735 units of affordable housing, an equity investment in an MDI, and one donation.

SERVICE TEST

The bank's performance under the Service Test in the state of Arkansas is rated High Satisfactory. Performance in the limited-scope AA supported the Service Test conclusion for the state of Arkansas.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Little Rock MSA	85.5	5	62.5	0.0	20.0	40.0	40.0	0.0	10.1	27.1	33.2	29.5	0.1
Limited-Scope													
Fayetteville MSA	14.5	3	37.5	33.3	0.0	0.0	33.3	33.3	5.7	20.4	43.5	29.8	0.6
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered two branches located in middle- or upper-income geographies that were within 1,000 feet of a moderate-income geography and serve residents of the moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 17 deposit-taking ATMs in the AA, of which 23.5 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and has a positive impact on the service delivery systems conclusion.

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

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA *
Limited-Scope							
Fayetteville MSA	3	0	1	0	0	1	1
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened five branches, of which one was in a moderate-income geography. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Little Rock MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 154 qualified CD service activities to 17 organizations, for a total of 180 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy, technical assistance training, and homebuyer education.

Service activities during the evaluation period include:

- Two bank employees partnered with a nonprofit organization that offer services primarily directed to low- and moderate-income communities. The bank offered financial literacy education to 60 college students.
- JPMCB partnered with several CCAs to provide 20 financial literacy trainings to 176 low- and moderate-income individuals. The trainings covered topics including affordable mortgage products, prevention of fraud, scams, and other elder financial exploitation.

Conclusion for Area Receiving a Limited-Scope Review

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

State of California

CRA rating for the state of California: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- The bank was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of California

Examiners assessed performance in 14 AAs in the state of California rating area. These were comprised of the entire Los Angeles-Long Beach, CA (Los Angeles) CSA, San Jose-San Francisco-Oakland, CA (San Francisco) CSA, Fresno-Madera-Hanford, CA (Fresno) CSA, Redding-Red Bluff, CA (Redding) CSA, and Sacramento-Roseville, CA (Sacramento) CSA, the entire Bakersfield, CA (Bakersfield) MSA, Chico, CA (Chico) MSA, El Centro, CA (El Centro) MSA, Salinas, CA (Salinas) MSA, San Diego-Chula Vista-Carlsbad, CA (San Diego) MSA, San Luis Obispo-Paso Robles, CA (San Luis Obispo) MSA, Santa Maria-Santa Barbara, CA (Santa Maria) MSA, and Visalia, CA (Visalia) MSA, and six counties in the non-MSA California AA. Refer to appendix A for a complete listing of the counties that comprise each AA.

The state of California is JPMCB's second largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$326.7 billion in deposits in the state of California, of which approximately \$319 billion represent retail branch deposits. As of December 31, 2023, the bank operated 906 branches and 3,244 deposit taking ATMs in the rating area, representing 18.6 percent of total branches and 20.7 percent of total ATMs. The bank originated and purchased approximately \$169.9 billion in loans, or 26.9 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 176 banks operating 5,645 branches in the state rating area. JPMCB ranked second in deposit market share with 18 percent.

Primary competitors include Bank of America with 23.2 percent deposit market share, Wells Fargo Bank with 16 percent, and U.S. Bank with 6.2 percent.

Los Angeles CSA

The Los Angeles CSA AA consists of Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. According to FDIC deposit market share data, as of June 30, 2023, there were 115 banks operating 2,600 branches in the AA. JPMCB operated 456 branches and ranked first in deposit market share with 19.9 percent. Primary competitors include Bank of America with 18.4 percent deposit market share, Wells Fargo Bank with 13.9 percent, and City National Bank with 6.5 percent. As of December 31, 2023, the bank operated 1,892 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Los Angeles CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Los Angeles CSA 2020 - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,925	8.1	28.5	28.6	33.2	1.6
Population by Geography	18,388,091	7.6	28.6	29.4	33.8	0.5
Housing Units by Geography	6,346,543	6.7	26.2	29.2	37.5	0.4
Owner-Occupied Units by Geography	3,074,292	2.6	18.6	30.8	47.9	0.1
Occupied Rental Units by Geography	2,780,656	11.3	34.6	27.1	26.4	0.6
Vacant Units by Geography	491,595	6.4	26.1	31.5	35.3	0.7
Businesses by Geography	1,937,113	4.8	20.2	26.9	46.6	1.5
Farms by Geography	23,826	3.8	20.4	31.1	44.0	0.6
Family Distribution by Income Level	4,090,774	23.9	16.5	17.6	42.0	0.0
Household Distribution by Income Level	5,854,948	25.3	15.6	16.5	42.6	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$86,003	Median Housing Value			\$449,452
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA MD		\$62,703	Median Gross Rent			\$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		\$86,766	Families Below Poverty Level			13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$61,507				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Los Angeles CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,286	5.5	27.6	31.8	32.8	2.3
Population by Geography	18,644,680	4.9	27.8	33.1	33.2	1.0
Housing Units by Geography	6,516,901	4.6	25.7	32.4	36.2	1.1
Owner-Occupied Units by Geography	3,183,770	1.6	18.3	34.1	45.6	0.4
Occupied Rental Units by Geography	2,836,877	8.0	34.2	30.8	25.3	1.7
Vacant Units by Geography	496,254	4.5	24.6	30.4	38.3	2.1
Businesses by Geography	2,533,955	3.3	19.4	30.0	45.2	2.2
Farms by Geography	30,359	2.9	19.2	32.9	43.9	1.1
Family Distribution by Income Level	4,179,103	23.1	16.7	18.4	41.7	0.0
Household Distribution by Income Level	6,020,647	25.2	15.4	17.1	42.3	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$106,451	Median Housing Value			\$610,825
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA MD		\$80,317	Median Gross Rent			\$1,640
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		\$101,160	Families Below Poverty Level			9.7%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$76,686				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Los Angeles CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Los Angeles CSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Los Angeles CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$769 to \$1,085 according to 2015 ACS data and from \$959 to \$1,331 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,230 to \$1,735 according to 2015 ACS data and ranging from \$1,534 to \$2,129 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Los Angeles CSA would be \$2,413 using 2015 ACS data and \$3,279 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 39.1 percent from the first quarter of 2020 to the

fourth quarter of 2023 in the Los Angeles MSA. Increases ranged from 37.5 percent to 50.9 percent for other components of the Los Angeles CSA. This acceleration in home prices creates new affordability concerns in the Los Angeles CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Los Angeles CSA, 13.1 percent of families had incomes below the FPL according to the 2015 ACS and 9.7 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Los Angeles CSA was 4.7 percent compared to 5.1 percent for the state of California and the national unemployment rate of 3.5 percent.

Economic Data

Anaheim-Santa Ana-Irvine, CA (Anaheim) MD

The Anaheim MD economy was in stable condition, with total employment close to pre-pandemic levels. Job growth was led by leisure/hospitality, healthcare, and professional services, though the labor force recovery stalled, and the area was losing residents. House prices declined in line with the U.S. average. Tourism continued to rebound, driven by the area's largest employer. Leisure/hospitality employment neared full recovery, hotel occupancy approached pre-pandemic levels, and tourism tax receipts surged, benefiting local government payrolls. However, labor shortages elevated operating costs due to inflation remained challenges. Manufacturing job gains slowed but were resilient, with demand for aerospace products and medical manufacturing boosting the sector. The area's manufacturing payrolls grew as supply-chain issues eased and demand for leisure travel spurred growth in aerospace production. The tech sector remained a vital source of high-wage jobs. Anaheim's cost advantages over other California tech hubs made it attractive to firms seeking lower costs. Housing affordability issues, capacity constraints, and slow population growth limited the housing market's contribution to the recovery.

Los Angeles-Long Beach-Glendale, CA (Los Angeles) MD

The Los Angeles MD economy cooled but was nearing a full employment recovery. Healthcare and leisure/hospitality drove job gains, with the entertainment industry also providing support. Although the pandemic exodus of residents slowed, the region continued to experience greater population loss compared to pre-pandemic levels. Slowing U.S. consumer spending reduced activity at the Ports of Los Angeles and Long Beach. Service-related industries with tourism rebounded as arrivals at Los Angeles International Airport and hotel occupancy increased. Tech layoffs were less severe than in the Bay Area. Firms announced significant workforce reductions, reflecting broader economic uncertainty and high interest rates. The tech sector's volatility, combined with rapid expansion during the pandemic, led to some correction as remote work became more common. These layoffs further contributed to resident outflow. The housing market faced a sharper correction than the national average, with rising borrowing costs lowering demand and house prices dropping. Sales fell to near-historic lows, and affordability worsened despite price contractions. High mortgage rates and sluggish income growth pushed homeownership further out of reach.

Oxnard-Thousand Oaks-Ventura, CA (Oxnard) MSA

The Oxnard MSA economy remained behind its peers, with job growth on par with California's but lagging pre-pandemic levels. Private service sectors showed mixed performance, with weakness in financial services offset by gains in healthcare and leisure/hospitality. Goods producers experienced a resurgence, and the unemployment rate fell below pre-pandemic levels, though partly due to a shrinking labor force. The Oxnard MSA's tech sector faced increasing competition from lower-cost metro areas. High costs of living, particularly skyrocketing single-family rents, contributed to out-migration, further straining the tech sector and the broader economy. The local naval base remained a cornerstone of the local economy as the base plays a critical role in U.S. national security. While defense provided stable, well-paying jobs, it did not significantly contribute to employment growth. Oxnard's large agricultural sector faced significant challenges, including rising labor costs and extreme drought conditions. Crop prices remained high, but input costs for fuel and fertilizer squeezed farmers' margins.

Riverside-San Bernardino-Ontario, CA (Riverside) MSA

The Riverside MSA's economy advanced as employment continued to climb, with nearly two-thirds of private industries adding jobs. Healthcare and leisure/hospitality led the gains. Transportation and warehousing growth slowed due to a shift in U.S. consumer spending from goods to services. The unemployment rate dipped to a historic low, and the labor force steadily increased. Residential construction slowed slightly, though permitting remained high. Slower growth in U.S. consumer spending contributed to slower gains in the logistics sector. The MSA outperformed most of California with expanding population, low costs, and less congestion. Despite having fewer high-wage jobs, the area benefited from a fast-growing logistics industry and a strong military presence. The area was well-positioned to attract commuters seeking affordable housing and lower living costs. Rising demand for housing from newcomers maintained upward pressure on house prices. Despite slower growth, house prices continued to outpace the state average.

Community Contacts

Examiners reviewed five community contacts completed during the examination period with organizations located throughout the area. One of the contacts included a listening session held with representatives of several area nonprofit organizations. These organizations focus on areas such as affordable housing, small business and economic development, financial literacy, and community development. Contacts noted the significant impact the COVID-19 pandemic had on small businesses and low-income households. Many smaller businesses struggled during the pandemic and closed permanently. In addition, many living-wage jobs were lost and have yet to return to pre-pandemic levels. Credit and CD needs identified include:

- Access to safe and affordable housing
- Credit counseling services
- Small dollar consumer loans
- Small business loans for micro-businesses and start-ups
- Financial education
- Education, employment, and other program assistance for undocumented residents

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loans funds, economic development organizations, and community development organizations that provide

opportunities to help meet community needs. Opportunities for support include grant funding, technical assistance for small businesses, volunteers and support for financial education programs, and providing credit building products.

San Francisco CSA

The San Francisco CSA AA consists of Alameda, Contra Costa, Marin, Merced, Napa, San Benito, San Francisco, San Joaquin, San Mateo, Santa Clara, Santa Cruz, Solano, Sonoma, and Stanislas counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 80 banks operating 1,584 branches in the AA. JPMCB operated 266 branches and ranked third in deposit market share with 17 percent. Primary competitors include Bank of America with 33.1 percent deposit market share, Wells Fargo Bank with 17.4 percent, and First Citizens Bank & Trust Company with 5.6 percent. As of December 31, 2023, the bank operated 712 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the San Francisco CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: San Francisco CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,934	9.4	23.0	34.7	31.7	1.2
Population by Geography	9,284,810	8.7	22.9	36.2	31.8	0.4
Housing Units by Geography	3,449,378	8.5	21.7	36.3	33.2	0.3
Owner-Occupied Units by Geography	1,795,915	3.7	17.2	37.6	41.4	0.1
Occupied Rental Units by Geography	1,444,618	13.9	27.1	34.7	23.7	0.6
Vacant Units by Geography	208,845	11.3	23.0	36.1	29.0	0.6
Businesses by Geography	896,324	8.5	19.1	32.9	39.1	0.5
Farms by Geography	20,485	4.4	17.6	39.9	38.0	0.1
Family Distribution by Income Level	2,170,973	23.8	16.3	18.4	41.5	0.0
Household Distribution by Income Level	3,240,533	25.6	15.2	16.7	42.5	0.0
Median Family Income MSA - 32900 Merced, CA MSA		\$46,793	Median Housing Value			\$568,144
Median Family Income MSA - 33700 Modesto, CA MSA		\$55,611	Median Gross Rent			\$1,469
Median Family Income MSA - 34900 Napa, CA MSA		\$80,921	Families Below Poverty Level			8.8%
Median Family Income MSA - 36084 Oakland-Berkeley-Livermore, CA MD		\$93,822				
Median Family Income MSA - 41884 San Francisco-San Mateo-Redwood City, CA MD		\$103,742				
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$107,126				

Table A – Demographic Information of the Assessment Area Assessment Area: San Francisco CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 42034 San Rafael, CA MD		\$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				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: San Francisco CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,203	7.2	22.3	37.9	30.1	2.5
Population by Geography	9,714,023	6.8	22.4	38.7	30.9	1.2
Housing Units by Geography	3,539,466	6.2	20.9	39.4	32.2	1.3
Owner-Occupied Units by Geography	1,883,599	2.9	17.2	40.6	38.7	0.5
Occupied Rental Units by Geography	1,444,101	10.4	25.9	37.9	23.7	2.2
Vacant Units by Geography	211,766	7.0	19.7	38.1	33.1	2.2
Businesses by Geography	1,114,323	5.5	18.1	36.0	37.3	3.2
Farms by Geography	24,791	3.7	17.2	41.5	36.2	1.5
Family Distribution by Income Level	2,245,434	22.8	16.7	19.2	41.3	0.0
Household Distribution by Income Level	3,327,700	25.2	15.2	17.6	41.9	0.0
Median Family Income MSA - 32900 Merced, CA MSA		\$61,162	Median Housing Value			\$844,018
Median Family Income MSA - 33700 Modesto, CA MSA		\$69,654	Median Gross Rent			\$1,962
Median Family Income MSA - 34900 Napa, CA MSA		\$107,995	Families Below Poverty Level			6.2%
Median Family Income MSA - 36084 Oakland-Berkeley-Livermore, CA MD		\$123,312				
Median Family Income MSA - 41884 San Francisco-San Mateo-Redwood City, CA MD		\$143,526				
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$145,548				
Median Family Income MSA - 42034 San Rafael, CA MD		\$159,898				

Table A – Demographic Information of the Assessment Area Assessment Area: San Francisco CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 42100 Santa Cruz-Watsonville, CA MSA		\$109,931				
Median Family Income MSA - 42220 Santa Rosa-Petaluma, CA MSA		\$102,411				
Median Family Income MSA - 44700 Stockton, CA MSA		\$76,536				
Median Family Income MSA - 46700 Vallejo, CA MSA		\$95,438				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the San Francisco CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the San Francisco CSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the San Francisco CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$585 to \$1,514 according to 2015 ACS data and from \$765 to \$1,999 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$936 to \$2,422 according to 2015 ACS data and ranging from \$1,223 to \$3,198 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the San Francisco CSA would be \$3,050 using 2015 ACS data and \$4,531 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 12.7 percent from the first quarter of 2020 to the fourth quarter of 2023 in the San Francisco MSA. Increases ranged from 19.9 percent to 41.3 percent for other components of the San Francisco CSA. Relative to the rest of the country, home prices did not significantly increase in the San Francisco CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the San Francisco CSA, 8.8 percent of families had incomes below the FPL according to the 2015 ACS and 6.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the San Francisco CSA was 4 percent compared to 5.1 percent for the state of California and the national unemployment rate of 3.5 percent.

Economic Data

Merced, CA (Merced) MSA

The Merced MSA's economy slowed down after reaching pre-crisis levels. Nonfarm employment stagnated, trailing national and regional growth rates. Manufacturing and retail trade experienced significant contractions and remained below pre-crisis levels. The unemployment rate fell to below pre-pandemic levels. The housing market cooled, with house prices declining while they continued to rise in the state and nation. Merced's farmers faced numerous challenges that weighed heavily on the local economy. Despite high commodity prices, profit margins were squeezed due to rising fuel and fertilizer costs. Persistent drought and water shortages negatively impacted yields. While smaller yields pushed prices higher, overall growth moderated due to these combined challenges. The MSA's heavy reliance on food processing subjected its manufacturing sector to similar headwinds as agriculture. Employment growth in manufacturing remained weak. Strong trends in education enrollment supported hiring at both state and local levels. The influx of families attracted by housing affordability, quality schools, and agriculture supported local government job growth.

Modesto, CA (Modesto) MSA

The Modesto MSA's economy expanded but faced recent slowdowns, with payroll growth lagging behind regional and national averages. Trade and manufacturing sectors contributed to this deceleration, though professional and business services and the public sector showed strong performance. The unemployment rate fell below pre-recession levels despite a sluggish labor force recovery. Housing prices rose due to tight supply but grew slower than the national average. Agriculture and food/beverage manufacturing faced challenges. Prices for major agricultural commodities like almonds and milk rose yet did not keep pace with high input costs and low yields. Farmers dealt with high fertilizer prices, drought, water constraints, rising labor costs, and elevated fuel prices. Manufacturing encountered similar issues. Healthcare supported job and income growth as manufacturing slowed.

Napa, CA (Napa) MSA

The Napa MSA's economy grew slowly and lagged the U.S. and California averages. Manufacturing faced setbacks affecting overall job growth. Leisure and hospitality recovered slowly, while healthcare saw strong employment gains. Although the unemployment rate fell below pre-pandemic levels, this was misleading due to a slower-than-average labor force recovery. Single-family home price appreciation increased recently but still lagged national and state averages. The wine industry grew faster than the national and California averages due to solid wine demand. Tourism helped grow leisure and hospitality payrolls but still hasn't recovered from pandemic-related job losses. Population contracted and out-migration continued due to high living costs and limited job opportunities.

Oakland-Berkeley-Livermore, CA (Oakland) MD

Oakland MD economy has improved, but job growth slowed, with employment still below pre-recession levels. Leisure and hospitality, along with healthcare, led the gains, while the public sector struggled. Outmigration persisted but eased slightly. Tech gains cooled, although the industry continued to be a key source of high-wage jobs. Despite being less affected by recent tech layoffs than San Francisco, the MD faced indirect impacts from remote work trends and high-profile layoffs. Manufacturing job growth

slowed but outperformed the national average, particularly in computer and electronics production. The housing market had a sharp correction, with prices declining and sales dropping to historic lows. Affordability worsened due to high prices and mortgage rates, though demand from first-time homebuyers and easing supply chain issues helped stabilize the market somewhat.

San Francisco-San Mateo-Redwood City, CA (San Francisco) MD

The San Francisco-Redwood City-South San Francisco experienced slow job growth, remaining further from its pre-pandemic employment peak than other large California economies. Despite broad-based job gains across private industries, the region continued to lose residents, though net outmigration had moderated. Tech sector layoffs did not create a larger economic downturn. High interest rates and reduced investor funding created challenges, exacerbated by the shift to remote work. The housing market faced a severe correction, with prices falling and sales hitting near-historic lows. Affordability worsened due to high prices, mortgage rates, and sluggish income growth, although demand from first-time buyers and easing supply chain issues helped stabilize prices somewhat. Despite recession fears and high costs, the region maintained its appeal due to its coastal and urban lifestyle, skilled workforce, and entrepreneurial culture.

San Jose-Sunnyvale-Santa Clara, CA (San Jose) MSA

The San Jose MD neared full employment recovery, surpassing many large California metro areas. Over 75 percent of private sector industries added jobs, though gains in technology and manufacturing slowed. Consumer services lagged but improved. Unemployment fell below pre-recession levels despite increasing labor force. House price appreciation and residential construction slowed. Slower technology employment growth was expected, but job growth remained higher than pre-pandemic levels. Rising interest rates and a cautious financial climate impacted tech hiring, complicated by the rise in remote work. Manufacturing in the MSA was challenged from rising interest rates and ongoing supply-chain issues, particularly for semiconductors. Although supply-chain stress moderated, lead times for chips remained long. Population decline was a concern, exacerbated by high costs and remote work flexibility. Although net out-migration moderated, the area continued to lose residents.

San Rafael, CA (San Rafael) MD

The San Rafael MD's economy faced challenges, with weaker job growth and the lowest recovery rate among California metro areas. While technology showed resilience, healthcare struggled due to persistent worker shortages and high living costs. Out-migration remained strong, despite soaring house price appreciation and increasing housing permits. Technology employment growth slowed but did not indicate a major downturn. The industry's volatility, combined with rising interest rates and remote work trends, complicated the outlook for downstream sectors like commercial real estate and consumer services. Healthcare experienced difficulties due to acute worker shortages. These challenges were exacerbated by high living costs and elevated national quit rates, making it hard to fill positions.

Santa Cruz-Watsonville, CA (Santa Cruz) MSA

The Santa Cruz MSA's economy lagged due to job growth trailing behind the national average. Employment remained below pre-pandemic levels. Tourism, a key sector, dragged down the overall performance, with hospitality employment declining and payrolls remaining below early-2020 levels. The public sector fully recovered due to an increase in hiring at state and local levels. Despite a drop in

the unemployment rate below pre-pandemic figures, the area had a significantly smaller labor force compared to early 2020. Housing market trends were mixed. While house price appreciation exceeded the national average, new permits for single-family homes stayed well below the long-term average. In government and education, modest growth was anticipated for the public sector due to long-term budget issues. The tourism industry faced recent struggles but was expected to improve as gasoline prices eased, and COVID-19 concerns diminished. Agriculture grew slower due to several challenges. Crop prices moderated, input costs for fuel and fertilizer rose, and severe drought conditions threatened yields

Santa Rosa-Petaluma, CA (Santa Rosa) MSA

The Santa Rosa MSA's economic recovery has progressed but lagged both regional and state trends. Payrolls remained lower than pre-pandemic levels, while California overall has nearly returned to its February 2020 employment levels. Housing remained stable, with a slowdown in price increases easing affordability concerns. The Tourism sector worsened due to rising gas prices and inflation that dampened travel to the area. Food and beverage manufacturing benefited from a consumer trend favoring organic and locally sourced products. The area faced challenges with ongoing out-migration and diminished housing affordability, resulting in a loss of residents.

Stockton, CA (Stockton) MSA

The economy of the Stockton MSA improved, with nonfarm payrolls exceeding pre-pandemic levels and growing faster than the broader California and national averages. The growth was fueled by robust public sector gains and steady private sector service expansions. The unemployment rate fell to below pre-recession levels. House price appreciation slowed, but prices were still rising. The logistics sector faced a slowdown as inflation affected consumer purchasing power and demand for logistics services cooled. Agriculture has been impacted by supply chain issues and declining crop prices. The MSA experienced a slowdown in population growth compared to regional and national trends, driven by high living costs and low earnings.

Vallejo, CA (Vallejo) MSA

The Vallejo MSA's economy struggled, with job growth lagging behind state and national averages. The private sector, particularly healthcare, added jobs at a below-average rate, while the public sector experienced a job growth spike. The unemployment rate remained notably higher than pre-crisis levels, even as the labor force weakened. House prices appreciated strongly but still trailed state and national trends. Robust demand supported a rebound in healthcare as labor shortages eased. The elderly population, the fastest-growing demographic, boosted healthcare demand. Despite challenges from contract disputes and clinical labor shortages, hiring in the sector improved. Biotechnology also emerged as a key growth area, with local firms expanding, and a new biomanufacturing center promising up to 10,000 jobs. Positive demographic trends positioned the area as an attractive option for remote workers seeking lower costs.

Community Contacts

Examiners reviewed seven community contacts completed during the examination period with organizations located throughout the area. These organizations focus on areas such as affordable housing, small business and economic development, and community development. Contacts noted that many households experienced increases in personal debt during the COVID-19 pandemic as they

accessed credit cards to meet day to day living expenses. During the pandemic there was increase demand for access to food, mental health, and general health services. The cost of living in the area is high so many lower wage workers must move far out from where they work to afford housing costs. Credit and CD needs identified include:

- Affordable housing, including maintaining Naturally Occurring Affordable Housing
- Access to capital for entrepreneurs
- Small dollar consumer loans and small business loans
- Low-cost bank accounts
- Access to banking services for individuals that utilize Individual Taxpayer Identification Numbers
- Financial services information and education that is provided in languages for non-English speakers
- Large dollar grant funding for local nonprofit organizations

Fresno CSA

The Fresno CSA AA consists of Fresno, Kings, and Madera counties. According to FDIC Deposit Market Share Data as of June 30, 2023, there were 22 banks operating 139 branches in the AA. JPMCB operated 15 branches and ranked third in deposit market share with 11.8 percent. Primary competitors include Wells Fargo Bank with 19.9 percent deposit market share, Bank of America with 18.1 percent, and Central Valley Community Bank with 6.2 percent. As of December 31, 2023, the bank operated 40 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Fresno CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Fresno CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	249	7.6	32.9	23.3	34.5	1.6
Population by Geography	1,260,934	6.8	32.9	24.0	34.5	1.8
Housing Units by Geography	416,287	6.2	31.0	24.2	38.5	0.1
Owner-Occupied Units by Geography	204,112	2.6	22.7	23.8	50.9	0.0
Occupied Rental Units by Geography	176,906	10.2	41.1	24.7	23.8	0.3
Vacant Units by Geography	35,269	7.2	28.4	24.1	40.0	0.2
Businesses by Geography	76,771	5.3	26.7	22.3	44.6	1.1
Farms by Geography	4,870	3.1	23.2	30.2	43.3	0.1
Family Distribution by Income Level	281,170	24.7	16.2	16.8	42.3	0.0
Household Distribution by Income Level	381,018	24.8	16.2	16.3	42.7	0.0
Median Family Income MSA - 23420 Fresno, CA MSA		\$49,999	Median Housing Value			\$184,643

Table A – Demographic Information of the Assessment Area Assessment Area: Fresno CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 25260 Hanford-Corcoran, CA MSA		\$49,735	Median Gross Rent			\$919
Median Family Income MSA - 31460 Madera, CA MSA		\$49,272	Families Below Poverty Level			21.2%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Fresno CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	290	9.7	28.6	26.6	34.1	1.0
Population by Geography	1,317,395	9.4	27.4	28.1	33.9	1.1
Housing Units by Geography	430,104	8.7	26.3	28.8	36.0	0.1
Owner-Occupied Units by Geography	219,058	4.6	18.6	28.6	48.2	0.0
Occupied Rental Units by Geography	179,122	13.8	36.4	28.4	21.3	0.2
Vacant Units by Geography	31,924	8.7	22.8	32.4	35.7	0.5
Businesses by Geography	102,678	7.2	22.0	28.9	41.1	0.8
Farms by Geography	6,082	4.2	19.1	34.3	42.2	0.1
Family Distribution by Income Level	293,172	23.7	16.7	17.9	41.6	0.0
Household Distribution by Income Level	398,180	25.3	16.0	16.6	42.2	0.0
Median Family Income MSA - 23420 Fresno, CA MSA		\$64,036	Median Housing Value			\$253,271
Median Family Income MSA - 25260 Hanford-Corcoran, CA MSA		\$64,353	Median Gross Rent			\$1,063
Median Family Income MSA - 31460 Madera, CA MSA		\$65,627	Families Below Poverty Level			16.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Fresno CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Fresno CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Fresno CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$616 to \$625 according to 2015 ACS data and from \$800 to \$820 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged

to afford a mortgage payment ranging from \$985 to \$1,000 according to 2015 ACS data and ranging from \$1,281 to \$1,313 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Fresno CSA would be \$991 using 2015 ACS data and \$1,360 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 44.3 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Fresno MSA. Increases ranged from 45.4 percent to 49.2 percent for other components of the Fresno CSA. This acceleration in home prices creates new affordability concerns in the Fresno CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Fresno CSA, 21.2 percent of families had incomes below the FPL according to the 2015 ACS and 16 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Fresno CSA was 8.2 percent compared to 5.1 percent for the state of California and the national unemployment rate of 3.5 percent.

Economic Data

Fresno, CA (Fresno) MSA

Fresno regained pandemic job losses and moved toward a more stable growth path. Government hiring boosted payroll growth while private sector hiring slowed. Unemployment declined despite a rise in labor force participation, and house price appreciation fell below the U.S. average. Agriculture remained central, producing nearly 20 percent of global almond output. However, higher food prices and a strong dollar reduced demand, while rising costs and drought conditions squeezed farmers' profits. Healthcare job growth moderated but remained above the national rate. Fresno's role as a regional medical hub and population growth supported healthcare expansion. Fresno's limited industrial diversity, overreliance on agriculture, and low educational attainment hindered long-term growth, despite stability from government and healthcare sectors.

Hanford-Corcoran, CA (Hanford) MSA

The Hanford MSA's economy lost momentum after nearly recovering its pandemic job losses. Employment declined due to weaknesses in manufacturing and logistics, despite gains in other sectors. The unemployment rate remained below pre-pandemic levels, partly due to low labor force participation. House price appreciation slowed faster than the national average, though the easing of supply constraints led to an increase in residential permits. Elevated dairy prices provided limited support to local farms, with milk being the region's major commodity. While higher dairy prices benefited farmers, low wages in the industry limited the broader economic impact. Rising input costs, like animal feed, reduced farm revenues, and droughts posed long-term risks to agriculture, threatening both dairy and almond production. The MSA faced challenges due to limited high-wage job

opportunities and economic diversity. The area was heavily reliant on agriculture and defense, with fewer fast-growing industries like technology. Although lower living costs supported population growth, the lack of new economic drivers slowed migration as people sought better-paying jobs elsewhere. There was some potential upside from remote work trends, which could help retain or attract residents.

Madera, CA (Madera) MSA

Madera's economy had expanded but began losing momentum. Nonfarm payroll growth slowed, falling below regional and national averages. Healthcare employment remained high post-pandemic, but job additions became scarce. The public sector drove job growth, approaching pre-pandemic levels. The unemployment rate increased slightly, driven by labor force growth. Almond production faced multiple challenges, including stagnating prices, rising costs for inputs like fertilizer, drought conditions, water shortages, and labor supply issues. Despite the possibility of higher almond prices, profitability remained difficult for farmers. Healthcare emerged as a key industry in Madera, with job growth outpacing regional and national averages. A local hospital's expansion supported further job creation in healthcare, a sector where wages were significantly higher than the local average. The housing market has cooled as higher mortgage rates reduced demand. Despite being one of California's most affordable metro areas, Madera experienced skyrocketing house prices due to strong job growth and household formation.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the area. These organizations focus on affordable housing. In addition, a review was conducted of a community needs assessment completed by a local government agency to assess the CD needs of the area. Contacts noted that the area has a high percentage of households that are living in poverty, particularly in the more rural areas. There is a need for more programming to help reduce poverty in the area. Contacts identified several needs in the community including:

- Services for low- and moderate-income youth
- Workforce development programs
- Financial Education Programs
- Affordable Housing
- Access to quality employment opportunities
- More expansive transportation options

Scope of Evaluation in State of California

The Los Angeles CSA and San Francisco CSA received full-scope review, as they represented the largest concentration of deposits, branches, and lending in the state of California. Examiners further selected the Fresno CSA for a full-scope review as it had not recently received a full-scope review. These CSAs combined account for 85.4 percent of the bank's adjusted deposits and 80.8 percent of lending in the state. The Los Angeles CSA received the most consideration when drawing overall conclusions for the state of California.

The Bakersfield, Chico, El Centro, Redding, Sacramento, Salinas, San Diego, San Luis Obispo, and Visalia MSAs and the non-MSA California AA received limited-scope reviews. Refer to the table in appendix A for more information.

There were no low-income geographies in the Redding or San Luis Obispo MSAs and there were no low-income geographies in the El Centro MSA during the 2021 through 2022 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies in those AAs.

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 the limited-scope AAs supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Los Angeles CSA	78,272	515,819	1,743	2,828	598,662	52.2	48.4
San Francisco CSA	54,864	255,811	2,274	764	313,713	27.3	36.2
Fresno CSA	2,441	11,566	651	30	14,688	1.3	0.8
Limited-Scope							
Bakersfield MSA	1,548	7,568	225	9	9,350	0.8	0.7
Chico MSA	399	2,285	142	15	2,841	0.2	0.3
El Centro MSA	264	905	65	9	1,243	0.1	0.1
Redding CSA	508	2,867	78	11	3,464	0.3	0.1
Sacramento CSA	9,896	54,471	718	170	65,255	5.7	2.9
Salinas MSA	1,486	5,522	170	16	7,194	0.6	0.9
San Diego MSA	16,315	87,934	604	408	105,261	9.2	7.6
San Luis Obispo MSA	1,316	6,137	230	12	7,695	0.7	0.5
Santa Maria MSA	1,781	7,788	159	33	9,761	0.9	0.8
Visalia MSA	706	2,660	308	6	3,680	0.3	0.2

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Non-MSA CA	681	3,728	218	15	4,642	0.4	0.4
Broader Statewide/Regional Area							
Direct Benefit				10	10	0.0	
Indirect Benefit				7	7	0.0	
Total	170,477	965,061	7,585	4,343	1,147,466	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Los Angeles CSA	68,166,630	10,248,095	24,259	6,410,044	84,849,028	49.9	48.4
San Francisco CSA	46,043,210	4,127,893	29,276	4,619,338	54,819,717	32.3	36.2
Fresno CSA	741,269	204,969	10,108	177,378	1,133,724	0.7	0.8
Limited-Scope							
Bakersfield MSA	372,877	154,447	6000	27,196	560,520	0.3	0.7
Chico MSA	134,858	38,025	1,885	70,719	245,487	0.1	0.3
El Centro MSA	54,656	19,977	1,660	41,920	118,213	0.1	0.1
Redding CSA	127,864	42,053	866	42,235	213,018	0.1	0.1
Sacramento CSA	5,934,479	846,177	8,598	798,859	7,588,113	4.5	3.0
Salinas MSA	1,003,629	103,475	3,538	131,622	1,242,264	0.7	0.9
San Diego MSA	12,456,707	1,687,183	8,160	1,248,569	15,400,619	9.1	7.6
San Luis Obispo MSA	723,091	121,339	2,756	25,342	872,528	0.5	0.5
Santa Maria MSA	1,940,667	136,701	2,503	108,589	2,188,460	1.3	0.8
Visalia MSA	162,329	46,439	4,109	23,598	236,475	0.1	0.2
Non-MSA CA	192,214	52,210	3,008	85,939	333,371	0.2	0.4
Broader Statewide/Regional Area							
Direct Benefit				103,961	103,961	0.1	
Indirect Benefit				26,710	26,710	0.0	
Total	138,054,480	17,828,983	106,726	13,942,019	169,932,208	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Los Angeles CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 19.9 percent. The bank ranked first among 115 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 935 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders were United Wholesale Mortgage (9.4 percent), Rocket Mortgage (6.8 percent), and Bank of America (3.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 276 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (28 percent), Bank of America (13.1 percent), and Citibank (7.8 percent).

In overall small loans to farms for 2022, the bank had a market share of 41.5 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 31 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (15.4 percent), U.S. Bank (15.3 percent), and Bank of America (13 percent).

San Francisco CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 17 percent. The bank ranked third among 80 depository financial institutions placing it in the top 4 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 10th among 780 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders were Rocket Mortgage (6.2 percent), United Wholesale Mortgage (5.3 percent), and Bank of America (5.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 25.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 220 small business lenders in the AA. The other top lenders were American Express (22 percent), Bank of America (12.4 percent), and Wells Fargo Bank (5.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 28.6 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 38 small farm lenders in the AA. The other top lenders were U.S. Bank (28.6 percent), Wells Fargo Bank (10 percent), and Farmers & Merchants Bank of Central California (9.6 percent).

Fresno CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 11.8 percent. The bank ranked third among 22 depository financial institutions placing it in the top 14 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 23rd among 529 home mortgage lenders in the AA, which placed it in the top 5 percent of lenders. The top three lenders were United Wholesale

Mortgage (11.4 percent), Rocket Mortgage (7.9 percent), and Alameda Mortgage Corporation (4.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 13.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 100 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (18.6 percent), Bank of America (12.2 percent), and Citibank (8.6 percent).

In overall small loans to farms for 2022, the bank had a market share of 22.5 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 24 small farm lenders in the AA. The other top lenders were U.S. Bank (16.6 percent), Bank of America (15.5 percent), and Wells Fargo Bank (12.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good geographic distribution of loans in the Los Angeles CSA, adequate geographic distribution in the San Francisco CSA, and poor geographic distribution in the Fresno CSA.

Home Mortgage Loans

Refer to Table O in the 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.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies and was equal to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

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.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, including the limited number of businesses located in low-income geographies, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in low-income geographies.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low- and moderate-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans, respectively.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

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.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in low-income geographies.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was near to both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was consistent with the performance in 2022 through 2023.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes in Los Angeles CSA San Francisco CSA, and Fresno CSA.

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.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, including the low affordability of housing and the significant acceleration of home prices the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but equal to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, including the low affordability of housing and the significant acceleration of home prices the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families but was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending to both low- and moderate-income borrowers.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, including the low affordability of housing, the significant acceleration of home prices, and the high rate of poverty, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Los Angeles CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

San Francisco CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Fresno CSA

Based on the data in the tables and considering the performance context factors discussed above, the

overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Los Angeles CSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 2,828 CD loans totaling \$6.4 billion, which represented 40.2 percent of the allocated tier 1 capital. By dollar volume, 92 percent of these loans funded affordable housing, 7.8 percent funded revitalization and stabilization efforts, and 0.1 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 228 PPP loans totaling \$200.4 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$51 million loan to support the construction of a warehouse distribution center in a moderate-income geography. The project is consistent with the county's general plan, which includes revitalization of industrial areas and the creation of permanent employment opportunities.
- A construction loan totaling \$67.2 million to construct a modular, permanent, supportive housing project in Los Angeles. The project provides affordable housing, paired with supportive services, to transition homeless persons from temporary housing into longer-term housing. The project includes 93 tenant units restricted to 30 percent or less of the AMI with HAP subsidies.

San Francisco CSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 764 CD loans totaling \$4.6 billion, which represented 38.6 percent of the allocated tier 1 capital. By dollar volume, 93.2 percent of these loans funded affordable housing, 5.9 percent funded revitalization and stabilization efforts, and 0.9 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 100 PPP loans totaling \$95.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

Two construction loans totaling \$89.9 million to support the third and final stage of a transit-adjacent development with 181 affordable housing units. All units will contain AMI restrictions, ranging from less than 20 percent to less than 80 percent of the AMI. A local nonprofit will occupy the limited commercial space, and a second nonprofit will provide workforce development services and resident services coordination.

A \$40.4 million loan to construct a housing development that includes 101 affordable housing units with income restrictions ranging from 25 to 60 percent of the AMI. The local housing authority has committed to supporting these housing units with 49 project-based HUD section 8 vouchers and 40 vouchers for homeless persons. The sponsoring nonprofit will also provide on-site support, including housing retention, economic stability, employment and education, health and wellness, social engagement, and youth enrichment.

Fresno CSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 30 CD loans totaling \$177.4 million, which represented 66.5 percent of the allocated tier 1 capital. By dollar volume, 94.6 percent of these loans funded affordable housing and 5.4 percent funded revitalization and stabilization efforts. Of the total CD loans, the bank made six PPP loans totaling \$9.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

An \$18.2 million construction loan for the adaptive reuse of a property to provide 40 affordable housing units. The project qualified for LIHTC with housing units restricted to tenants with incomes 60 percent or less of the AMI. All units will be supported by transitional or project-based housing vouchers.

An \$8.8 million construction loan to support the development and rehabilitation of nine properties across two sites, which will create 29 affordable housing units restricted to tenants earning 30 to 60 percent of the AMI. Of the 29 units, 20 will be supported by 20-year project-based vouchers. The local housing authority will provide resident services, including adult education, health, and skill building classes.

Product Innovation and Flexibility

Los Angeles CSA

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 60,702 loans in the amount of \$8.2 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	984	259,022
Federal Housing Administration (FHA)	161	76,267
Chase Homebuyer Grant Loans	958	434,426
Homebuyer Education Grants	190	95
Home Lending SPCP	411	214,323
Community Lending Program (Correspondent SPCP)	259	109,510
Veteran's Administration (VA)	48	25,268
VA Purchase Closing Credit	21	10,375
Business Card SPCP	1,367	5,696
Business Banking SPCP	1,376	158,137
Small Business Administration (SBA)	739	254,998
Paycheck Protection Program (PPP)	52,580	4,102,338
Affordable Housing Preservation Program	1,608	2,501,284
Total	60,702	8,151,739

San Francisco CSA

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 19,489 loans in the amount of \$3.2 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	444	131,130
Federal Housing Administration (FHA)	54	25,429
Chase Homebuyer Grant Loans	855	484,077
Homebuyer Education Grants	129	65
Home Lending SPCP	12	8,041
Community Lending Program (Correspondent SPCP)	97	34,335
Veteran's Administration (VA)	14	8,940
VA Purchase Closing Credit	2	1,712
Business Card SPCP	223	995
Business Banking SPCP	104	11,645
Small Business Administration (SBA)	202	78,985
Paycheck Protection Program (PPP)	16,975	1,557,934
Affordable Housing Preservation Program	378	830,916
Total	19,489	3,174,204

Fresno CSA

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 1,288 loans in the amount of \$136.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	39	6,450
Federal Housing Administration (FHA)	10	2,728
Chase Homebuyer Grant Loans	41	9,552
Homebuyer Education Grants	13	7
Community Lending Program (Correspondent SPCP)	41	9,979
Veteran's Administration (VA)	2	770
Business Card SPCP	48	194
Business Banking SPCP	15	1,342
Paycheck Protection Program (PPP)	1,075	96,771
Affordable Housing Preservation Program	4	8,261
Total	1,288	136,054

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of California.

The bank made 10 CD loans totaling \$104 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered an additional \$26.7 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bakersfield MSA, Chico MSA, El Centro MSA, Salinas MSA, San Diego MSA, San Luis Obispo MSA, Santa Barbara MSA, Visalia MSA, Redding CSA, Sacramento CSA, and non-MSA California AAs was consistent with the bank's performance in the full-scope areas. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

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. Performance in the limited-scope AAs and broader statewide or regional investments supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Los Angeles CSA	99	472,625	172	1,444,880	271	37.7	1,917,505	40.0	0	0
San Francisco CSA	58	305,839	114	1,131,783	172	24.0	1,437,621	30.0	0	0
Fresno CSA	4	1,244	18	19,139	22	3.1	20,383	0.43	0	0
Limited-Scope										
Bakersfield MSA	6	6,817	2	9	8	1.1	6,826	0.1	0	0
Chico MSA	2	3,378	6	119,288	8	1.1	122,667	2.6	0	0
El Centro MSA	6	8,299	4	50,311	10	1.4	58,609	1.2	0	0
Redding CSA	0	0	4	46,895	4	0.6	46,895	1.0	0	0
Sacramento CSA	12	50,143	23	189,109	35	4.9	239,252	5.0	0	0
Salinas MSA	9	19,923	1	21,347	10	1.4	41,270	0.86	0	0
San Diego MSA	25	108,720	43	647,318	68	9.5	756,038	15.8	0	0
San Luis Obispo MSA	1	5,157	1	4,200	2	0.3	9,357	0.2	0	0
Santa Maria MSA	9	22,632	3	29,956	12	1.7	52,588	1.1	0	0
Visalia MSA	3	237	2	25,852	5	0.7	26,089	0.5	0	0
Non-MSA CA	3	3,628	4	19,085	7	1.0	22,712	0.5	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	82	33,036	82	11.4	33,036	0.7	0	0
Indirect Benefit	1	206	1	4,350	2	0.3	4,556	0.1	0	0
Total	238	1,008,846	480	3,786,557	718	100.0	4,795,403	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

Los Angeles CSA

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 92 grants and donations, totaling \$22.8 million to 49 organizations.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing and community services for low- and moderate-income individuals. By dollar volume, 64.3 percent of investments supported affordable housing, 31.6 percent funded community services to low- and moderate-income individuals, 4 percent supported economic development, and 0.1 percent supported revitalization and stabilization efforts.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 34 LIHTC investments totaling \$822.5 million that supported 3,622 affordable housing units. Additionally, the bank made nine NMTC investments totaling \$68.9 million and one HTC investment totaling \$1.2 million.

Qualified investments made during the evaluation period include:

- A \$59.4 million LIHTC investment for the construction of a 269-unit apartment project. Of the 269 units, 214 units were restricted to households with incomes 60 percent or less of the AMI and 52 units are restricted to households with incomes below 80 percent of the AMI. JPMCB partnered with a local affordable housing nonprofit that will provide on-site social services.
- A \$12.3 million NMTC equity investment to fund the construction of a public boarding school in the AA. The school will be in a formerly undeveloped and blighted area. Half the students will come from the local area, which has a 30 percent poverty rate. The school will have a 150,000 square foot campus that includes 170 dorm rooms for low-income youth.

San Francisco CSA

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 60 grants and donations, totaling \$18.3 million to 33 organizations.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 96.2 percent of investments supported affordable housing, 2.1 percent supported economic development, 1.5 percent funded community services to low- and moderate-income individuals, and 0.2 supported revitalization and stabilization efforts.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 34 LIHTC investments totaling \$710.8 million that supported 3,225 affordable housing units. Additionally, the bank made six NMTC investments totaling \$31.5 million.

Qualified investments made during the evaluation period include:

A \$56.9 million LIHTC investment to construct a 181-unit development consisting of two buildings and a parking garage. All units, except two, will be restricted to households earning 60 percent or less of the AMI, with 46 units serving formerly homeless adults and 75 of the units supported by project-based vouchers. A local community organization will provide on-site social support services, workforce development training, language support for non-English speaking residents, and health and wellness classes.

Four grants, totaling \$3.5 million, to a local Community Development Corporation to support the revitalization of a neighborhood that was significantly impacted by the COVID-19 pandemic. Grant funds were used to provide low-income students with laptops to support remote learning during the

pandemic, acquire and convert properties to affordable housing, support local small businesses, and improve workforce development activities.

Fresno CSA

The bank had a good level of qualified CD investment and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 7.6 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 12 grants and donations, totaling \$2.6 million to four organizations.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 67.5 percent of investments supported affordable housing, 19.7 percent supported economic development, 10.4 percent funded community services to low- and moderate-income individuals, and 2.4 supported revitalization and stabilization efforts.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two LIHTC investments totaling \$12.3 million that supported 127 affordable housing units. Additionally, the bank made one NMTC investment totaling \$3.5 million.

Qualified investments made during the evaluation period include:

A \$12.2 million LIHTC investment to construct a 48-unit affordable housing development. Of the 48 units, seven will be set aside for residents experiencing homelessness with mental disabilities and actively marketed to veterans. The remaining units will be restricted to households earning 60 percent or less of the AMI. A local housing organization will provide social services to residents.

Five grants totaling \$2.1 million to a local community foundation created to ensure the local government development plan was equitable for all residents. The foundation uses networks of local organizations to amplify CDFI activity within the AA and to identify obstacles to capital deployment and assist in determining priorities for growth.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Chico MSA, El Centro MSA, Redding CSA, Sacramento CSA, Salinas MSA, San Diego MSA, Santa Maria MSA, Visalia MSA and non-MSA California AA was consistent with the bank's performance in the full-scope areas. Performance in the Bakersfield MSA and San Luis Obispo MSA was weaker than the bank's performance in the full-scope areas due to a lower volume of qualified investments relative to allocated capital. Performance in the limited-scope areas had a neutral impact on the overall Investment Test conclusion for the state of California.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of California. The bank made 82 investments totaling \$33 million to organizations in the broader

statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals, economic development, and affordable housing through equity investments, and numerous grants and donations.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$4.6 million of current- and prior-period investments in the broader statewide or regional area that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These were LIHTC investments that supported 94 affordable units.

SERVICE TEST

The bank's performance under the Service Test in the state of California is rated Outstanding. Performance in the limited-scope AAs supported the Service Test conclusion for the state of California.

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the Los Angeles CSA, and readily accessible to geographies and individuals of different income levels in the San Francisco CSA and Fresno CSA.

During the evaluation period, the bank waived standard, out-of-network ATM fees for individuals enrolled in a states' EBT program. Across the state of California, JPMCB waived approximately \$10.8 million in ATM fees for California EBT transactions covering approximately 3.3 million transactions.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Los Angeles CSA	48.4	444	49.0	3.2	18.7	28.4	48.2	1.6	4.9	27.8	33.1	33.2	1.0
San Francisco CSA	36.2	254	28.0	4.3	20.1	35.8	36.2	3.5	6.8	22.4	38.7	30.9	1.2
Fresno CSA	0.8	15	1.7	6.7	20.0	33.3	40.0	0.0	9.4	27.4	28.1	33.9	1.1
Limited-Scope													
Bakersfield MSA	0.7	11	1.2	0.0	18.2	36.4	36.4	9.1	8.0	28.0	29.8	31.4	2.8
Chico MSA	0.3	3	0.3	33.3	0.0	66.7	0.0	0.0	8.2	21.7	37.2	32.9	0.0
El Centro MSA	0.1	1	0.1	0.0	0.0	0.0	100.0	0.0	1.5	29.6	28.6	36.4	3.9
Redding CSA	0.1	3	0.3	0.0	33.3	66.7	0.0	0.0	0.0	28.8	51.1	20.1	0.0

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Sacramento CSA	2.9	46	5.1	4.4	21.7	32.6	41.3	0.0	7.1	23.2	35.1	33.7	0.9
Salinas MSA	0.9	12	1.3	8.3	25.0	25.0	41.7	0.0	5.1	28.2	36.8	28.0	1.9
San Diego MSA	7.6	86	9.5	4.7	19.8	32.6	43.0	0.0	6.5	24.5	34.6	33.4	1.0
San Luis Obispo MSA	0.5	7	0.8	0.0	0.0	71.4	28.6	0.0	0.0	10.4	63.5	18.0	8.0
Santa Maria MSA	0.8	10	1.1	10.0	10.0	30.0	50.0	0.0	6.8	28.4	30.4	32.6	1.8
Visalia MSA	0.2	4	0.4	0.0	25.0	50.0	25.0	0.0	1.7	32.0	33.8	32.4	0.0
Non-MSA CA	0.4	10	1.1	10.0	50.0	40.0	0.0	0.0	1.9	30.5	52.3	15.3	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

Los Angeles CSA

The bank's distribution of branches in low- and moderate-income geographies was below the percentage of the population living within those geographies. The Los Angeles CSA branch distribution was impacted by the 2020 Census new income designations, with a loss of 10 low-income branches, which lowered the bank's low-income branch distribution. Examiners further considered 98 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 60 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Los Angeles CSA included 41 Community Branches, of which six were in low-income geographies and 21 were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 1,892 deposit-taking ATMs in the AA, of which 4.2 percent were in low-income geographies and 23.9 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

San Francisco CSA

The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. The San Francisco CSA branch distribution was impacted by the 2020 Census new income designations, with a loss of seven low-income and six moderate-income branches which lowered the bank's low- and moderate-income branch distribution. Examiners further considered 76 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 40

were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the San Francisco CSA included 14 Community Branches, of which two were in low-income geographies and seven were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 712 deposit-taking ATMs in the AA, of which 4.9 percent were in low-income geographies and 21.5 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Fresno CSA

The bank's distribution of branches in low- and moderate-income geographies was near to the percentage of the population living within those geographies. The Fresno CSA branch distribution was impacted by the 2020 Census new income designations, with a loss of two moderate-income branches which lowered the bank's moderate-income branch distribution. Examiners further considered six branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which three were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Fresno CSA included two Community Branches, which were in middle-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 40 deposit-taking ATMs in the AA, of which 12.5 percent were in low-income geographies and 17.5 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA *
Full-Scope							
Los Angeles CSA	12	61	0	-8	-12	-27	-2
San Francisco CSA	11	37	0	-4	-9	-13	0
Fresno CSA	0	2	0	0	0	-2	0
Limited-Scope							
Bakersfield MSA	1	3	-1	-1	-1	1	0
Chico MSA	0	1	0	0	-1	0	0
El Centro MSA	0	0	0	0	0	0	0
Redding CSA	0	0	0	0	0	0	0
Sacramento CSA	2	6	-1	-1	0	-2	0

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Salinas MSA	0	1	-1	0	0	0	0
San Diego MSA	1	12	0	-1	-7	-3	0
San Luis Obispo MSA	0	2	0	0	0	-1	-1
Santa Maria MSA	0	1	0	0	0	-1	0
Visalia MSA	0	0	0	0	0	0	0
Non-MSA CA	0	0	0	0	0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

Los Angeles CSA

To the extent changes have been made, the bank's opening and closing of branches 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 12 branches, of which one was in a moderate-income geography. The bank closed 61 branches, of which nine were in moderate-income geographies. The branch closures were the result of safety concerns, branch fire, proximity to another branch, low transaction volume, and market efficiency.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were 16 locations with drive-thru facilities operating under similar hours.

San Francisco CSA

To the extent changes have been made, the bank's opening and closing of branches generally 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 11 branches, of which one was in a low-income geography and one in a moderate-income geography. The bank closed 37 branches, of which one was in a low-income geography and five in moderate-income geographies. The branch closures were the result of proximity to another branch, safety concerns, and low transaction volume.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturdays. There were four locations with drive-thru facilities operating under similar hours.

Fresno CSA

To the extent changes have been made, 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. During the evaluation period, the bank closed two upper-income branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were three locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Los Angeles CSA, San Francisco CSA, and Fresno CSA.

Los Angeles CSA

Bank records show that during the evaluation period, employees provided their financial or job-specific expertise and/or technical assistance for 12,728 qualified CD service activities to 382 organizations, for a total of 16,780 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 19 bank employees spending 1,095 hours participating on boards and committees for 22 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy, homeownership and maintenance, and financial education.

Service activities during the evaluation period include:

- JPMCB employees worked with several nonprofits to deliver homebuyer seminars to low- and moderate-income individuals. These seminars explained the mortgage process and provided education about homeownership, credit, savings, and down-payment assistance subsidies targeting low- and moderate-income homebuyers.
- A JPMCB Legal Team Manager served on the board of a nonprofit organization in the Latino neighborhood of South-Central Los Angeles. The organization's mission is to battle poverty by empowering youth and adults with the skills and resources necessary to thrive. It offers a wide range of services including financial coaching and asset-building tools for parents and college readiness support for high school students.

San Francisco CSA

Bank records show that during the evaluation period, employees provided their financial or job-specific expertise and/or technical assistance for 6,564 qualified CD service activities to 186 organizations, for a total of 12,516 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 26

bank employees spending 1,976 hours participating on boards and committees for 26 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy, homeownership and maintenance, and financial education.

Service activities during the evaluation period include:

- A JPMCB employee served as chair of the board of a housing development corporation. The organization's mission is to foster financial opportunity and stability through the development of affordable housing, the facilitation of homeownership, and the economic empowerment and revitalization of the Fillmore and other neighborhoods of San Francisco.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education to 3,499 low- and moderate-income individuals. These services were responsive to the need to improve financial health for underserved populations.

Fresno CSA

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 452 qualified CD service activities to 30 organizations, for a total of 709 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families; however, the bank also provided service hours for organizations that provided affordable housing, economic development, and revitalization and stabilization to low- and moderate-income individuals, families, and geographies. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- JPMCB partnered with a local refugee assistance center to provide homebuyer education to the community they serve. The classes provide an overview of the homebuying process including underwriting documentation requirements so participants can be mortgage ready.
- JPMCB employees spent 210 hours mentoring 70 small businesses within the Founders Forward program. JPMCB's Founders Forward Small Business Initiative provided pro bono consulting to small businesses. As part of the program, each entrepreneur was assigned a dedicated team of JPMCB volunteers who focused on addressing the entrepreneur's self-identified business challenge during an eight-week cohort.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Sacramento CSA, San Diego MSA, and Santa Maria MSA was consistent with the bank's overall performance in the full-scope areas. Performance in the Redding CSA, Salinas MSA and non-MSA California AA was stronger than the bank's performance in the full-scope area due to higher percentage of branch distributions in low- and moderate-income geographies. Performance in the Bakersfield MSA, Chico MSA, El Centro MSA, San Luis Obispo MSA, and Visalia MSA was weaker than the bank's performance in the full-scope areas. Weaker performance was due to lower percentage of branch distributions in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and

moderate-income geographies. The bank's performance in the limited-scope AAs supported the Service Test conclusion for the state of California.

State of Colorado

CRA rating for the state of Colorado: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Colorado

JPMCB delineated four AAs in the state of Colorado that were comprised of the Denver-Aurora, CO (Denver) CSA, Colorado Springs, CO (Colorado Springs) MSA, Fort Collins, CO (Fort Collins) MSA, and four counties in the non-MSA Colorado. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Colorado is JPMCB's 10th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$23.8 billion in deposits in the state of Colorado rating area, of which approximately \$22.7 billion represent retail branch deposits. As of December 31, 2023, the bank operated 109 branches and 264 deposit taking ATMs in the rating area, representing 2.2 percent of total branches and 1.7 percent of total ATMs. The bank originated and purchased approximately \$20.6 billion in loans, or 3.3 percent of total bank loan originations and purchases, in the rating during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 91 banks operating 1,008 branches in the state rating area. JPMCB ranked second in deposit market share with 14.6 percent. Primary competitors include Wells Fargo Bank with 20 percent market share, Firstbank with 13.3 percent, and U.S. Bank with 11.3 percent.

Denver CSA

The Denver CSA AA consists of Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, Park, and Weld counties. According to FDIC Deposit Market Share

Data, as of June 30, 2023, there were 75 banks operating 730 branches in the AA. JPMCB operated 89 branches and was ranked second in deposit market share with 15.6 percent. Primary competitors include Wells Fargo Bank with 20.8 percent deposit market share, Firstbank with 13.7 percent, and U.S. Bank with 12 percent. As of December 31, 2023, the bank operated 215 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Denver CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Denver CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % 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	616,981	6.4	19.7	33.2	40.5	0.3
Farms by Geography	13,090	6.3	19.1	36.4	37.9	0.2
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%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Denver CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	868	5.2	24.3	36.9	31.0	2.6
Population by Geography	3,623,560	4.9	25.4	36.1	32.5	1.0
Housing Units by Geography	1,398,201	4.7	25.6	37.7	30.7	1.3
Owner-Occupied Units by Geography	868,319	2.6	20.2	39.1	37.6	0.5
Occupied Rental Units by Geography	458,766	8.8	35.1	34.9	18.6	2.7
Vacant Units by Geography	71,116	4.9	29.5	38.5	24.6	2.5

Table A – Demographic Information of the Assessment Area Assessment Area: Denver CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Businesses by Geography	918,117	3.7	22.8	33.5	37.0	3.0
Farms by Geography	18,616	3.4	21.8	39.7	33.7	1.4
Family Distribution by Income Level	835,424	20.2	18.1	21.9	39.8	0.0
Household Distribution by Income Level	1,327,085	22.9	16.8	18.8	41.5	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$118,307	Median Housing Value			\$436,218
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$103,157	Median Gross Rent			\$1,452
Median Family Income MSA - 24540 Greeley, CO MSA		\$85,167	Families Below Poverty Level			5.4%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Denver CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Denver CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Denver CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$881 to \$1,212 according to 2015 ACS data and from \$1,065 to \$1,479 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,409 to \$1,938 according to 2015 ACS data and ranging from \$1,703 to \$2,366 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Denver CSA would be \$1,536 using 2015 ACS data and \$2,342 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 38.2 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Denver MSA. Increases averaged approximately 36 percent for other components of the Denver CSA. This acceleration in home prices creates new affordability concerns in the Denver CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Denver CSA, 7.9 percent of families had incomes below the FPL according to the 2015 ACS and 5.4 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Denver CSA was 3.3 percent compared to the state of Colorado at 3.2 percent and the national unemployment rate of 3.5 percent.

Economic Data

Job growth in the Denver area increased as of the end of 2022. Professional/business services and healthcare drove employment strength, with help from a growing public sector. This has outweighed weakness in leisure/hospitality and financial services. The unemployment rate increased due to increased labor force participation. The area's strengths included a high concentration of dynamic, knowledge-based industries, strong in-migration and population growth, a skilled workforce, and high employment diversity. Weaknesses included an elevated cost of living relative to other Mountain West metro areas and an expensive housing market with declining affordability.

Denver-Aurora-Lakewood, CO (Denver) MSA

Denver's economy slowed during the evaluation period. Solid job gains propelled by professional and business services were offset by losses in transportation, warehousing, and government. Higher interest rates slowed the pace of high-tech expansion. Following near-zero interest rates and a booming economy, venture capital funding and hiring reached record levels. However, Federal Reserve rate hikes led firms to cut back on investment and hiring plans. Travel-dependent industries saw growth, buoyed by Denver International Airport's vital role as a domestic hub. Passenger traffic rebounded significantly due to strong domestic travel demand, with leisure travelers returning in full force. The housing market slowed as house prices and mortgage rates rose.

Boulder, CO (Boulder) MSA

Boulder's economy experienced job growth within the leisure, hospitality, and healthcare sectors, while tech-focused professional and business services experienced a decline. In the high-tech sector, rising financing costs prompted a slowdown. Increased asset market activity and lower investment costs led to a surge in venture capital funding over the past year, driving significant job additions. Despite economic challenges, aerospace and computer systems design firms showed resilience due to stable government contracts. In contrast, startups and smaller firms faced difficulties stemming from higher financing costs and challenges in capital raising. A limited supply of single-family homes contributed to stronger year-over-year house price growth compared to the national average. Affordability concerns hindered in-migration, despite Boulder's scenic location and high-wage job opportunities. Restrictive zoning and land-use laws impeded population growth.

Greeley, CO (Greeley) MSA

Greeley's economy experienced slower job growth compared to the region. Broad-based weaknesses, including in the energy sector, kept overall payrolls below pre-pandemic levels. The leisure, hospitality, and health services sectors served as the largest sources of support. Single-family house price appreciation continued to be elevated, but an increase in housing supply kept the growth rate slightly below the state average. In the energy sector, the number of active oil rigs increased due to ongoing supply pressures from geopolitical events, particularly Russia's invasion of Ukraine. A wave of mergers and acquisitions in the energy industry stabilized and facilitated renewed investment. The beef industry benefitted from robust global demand, keeping local ranchers and meatpackers busy. Greeley emerged

as one of the largest cattle-producing metro areas in the U.S. Elevated cattle prices positively impacted local meatpackers and ranchers, although high input costs, such as animal feed, tempered overall gains. Meatpackers added jobs to meet high demand, but the economic impact of these jobs was limited due to lower industry wages. In-migration to Greeley remained supported by its lower living costs compared to other Colorado metro areas. The relatively low cost of living and affordable housing attracted migrants from pricier regions like Denver and Boulder. Greeley boasted one of the lowest median single-family house prices in Colorado. However, over a third of residents commuted to jobs outside the metro area due to its heavy reliance on agriculture and energy, alongside a scarcity of high-wage jobs.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and financing and supporting small businesses. Contacts noted that the area is experiencing positive net in-migration and is becoming more diverse. Credit and CD needs identified include:

- Grant support for struggling small businesses
- Affordable Housing
- Down payment assistance for first time homebuyers
- Access to capital for small businesses
- Grant support for small businesses

The area is served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include investing in affordable housing bonds and securitized loan pools; and providing technical assistance to small businesses.

Scope of Evaluation in State of Colorado

Examiners selected the Denver CSA for full-scope review, as it represented the largest concentration of deposits and branches in the state of Colorado. The Denver CSA accounts for 87.7 percent of the bank's adjusted deposits and 81.2 percent of lending in the state. The Colorado Springs and Fort Collins MSAs and non-MSA Colorado AA received limited-scope reviews. Refer to the table in appendix A for more information.

There were no low- or moderate-income geographies in the non-MSA Colorado AA during the 2021 through 2022 analysis period. Lending Test conclusions were based solely on the borrower distribution of lending and Service Test conclusions were based on performance context. There were no low-income geographies in the non-MSA Colorado AA during the 2022 through 2023 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

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 the limited-scope AAs had a neutral impact on the overall rating. CD lending in the

broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Denver CSA	27,726	109,493	901	124	138,244	81.3	87.4
Limited-Scope							
Colorado Springs MSA	2,332	11,912	100	10	14,354	8.4	6.5
Fort Collins MSA	2,132	9,740	182	7	12,061	7.1	5.5
Non-MSA CO	1,198	4,226	56	0	5,480	3.2	0.6
Broader Statewide/Regional Area							
Direct Benefit				1	1	0.0	
Indirect Benefit				4	4	0.0	
Total	33,388	135,371	1,239	146	170,144	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Denver CSA	13,745,952	1,911,197	10,717	298,568	15,966,434	87.4	87.4
Limited-Scope							
Colorado Springs MSA	839,660	188,221	953	33,263	1,062,097	9.5	6.5
Fort Collins MSA	780,449	164,854	1,934	7,294	954,531	2.3	5.5
Non-MSA CO	2,543,229	63,516	648	0	2,607,393	0.7	0.6
Broader Statewide/Regional Area							
Direct Benefit				500	500	0.0	
Indirect Benefit				15,993	15,993	0.0	
Total	17,909,290	2,327,788	14,252	355,618	20,606,948	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 15.6 percent. The bank ranked second among 75 depository financial institutions placing it in the top 3 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 13th among 879 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders were United Wholesale Mortgage (7.1 percent), Rocket Mortgage (4.3 percent), and Bellco Credit Union (3.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 27.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 223 small business lenders in the AA. The other top lenders were American Express (18.9 percent), U.S. Bank (9.6 percent), and Capital One (6.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 27.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 38 small farm lenders in the AA. The other top lenders were Bank of Colorado (14.2 percent), U.S. Bank (12.1 percent), and John Deere Financial (11.1 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was equal to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

Refer to Table Q in the 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 tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to better distributions of lending in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and was below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Colorado 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 124 CD loans totaling \$298.6 million, which represented 14.5 percent of the allocated tier 1 capital. By dollar volume, 52.7 percent of these loans funded revitalization and stabilization efforts, 45.5 percent funded affordable housing, 1.6 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made 62 PPP loans totaling \$59.4 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$36.8 million construction loan for a transit-oriented, mixed-use development, that included 209 affordable multi-family units and 2,400 square feet of ground-level retail space. This project helped to revitalize/stabilize a low-income geography.
- A \$7.9 million permanent loan for an affordable housing development in a moderate-income geography that was responsive to the needs of the community. The project contains a total of 85

units with five units restricted to households earning 30 percent of AMI or less and 80 units that will be leased to seniors earning 60 percent of AMI or less.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 10,454 loans in the amount of \$1.3 billion were funded under the following innovative and/or flexible programs. The bank preserved 1,086 units of affordable housing via the Affordable Housing Preservation Program.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	543	145,352
Federal Housing Administration (FHA)	26	9,421
Chase Homebuyer Grant Loans	409	156,711
Homebuyer Education Grants	185	93
Home Lending SPCP	10	4,108
Community Lending Program (Correspondent SPCP)	102	31,557
Veteran's Administration (VA)	22	12,103
VA Purchase Closing Credit	12	7,427
Business Card SPCP	108	459
Business Banking SPCP	53	5,545
Small Business Administration (SBA)	140	40,525
Paycheck Protection Program (PPP)	8,804	764,180
Affordable Housing Preservation Program	40	89,581
Total	10,454	1,267,062

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Colorado.

The bank made one CD loan totaling \$500,000 to a borrower in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$16 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Colorado Springs MSA and Fort Collins MSA was consistent with the bank's performance in the full-scope area. The bank's performance in the non-MSA Colorado AA was weaker than the bank's performance in the full-scope area due to lower geographic and borrower distributions of loans and no CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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 the limited-scope AAs and investments in the broader statewide and regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 23.2 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 14 grants and donations, totaling \$8.8 million to 10 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Denver CSA	32	103,963	37	374,164	69	77.5	478,127	80.0	0	0
Limited-Scope										
Colorado Springs MSA	5	13,099	4	50,665	9	10.1	63,764	10.7	0	0
Fort Collins MSA	3	19,685	2	6,867	5	5.6	26,552	4.4	0	0
Non-MSA CO	0	0	0	0	0	0.0	0	0.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	1	750	1	1.1	750	0.1	0	0
Indirect Benefit	1	81	4	28,338	5	5.6	28,419	4.8	0	0
Total	41	136,828	48	460,783	89	100.0	597,611	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 97 percent of investments supported affordable housing, 1.5 percent supported revitalization and stabilization efforts, 1.3 percent funded community services to low- and moderate-income individuals, and 0.2 percent supported economic development.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 17 LIHTC investments totaling \$268.3 million that

supported 1,944 affordable housing units. Additionally, the bank made one NMTC investment totaling \$7 million.

Qualified investments made during the evaluation period include:

- A \$35.2 million equity investment in a LIHTC project for the renovation of an affordable housing development. This project rehabilitated five buildings of a former college campus and created 154 affordable housing units, all of which are restricted to households earning 60 percent or less of the AMI.
- A \$7 million NMTC investment to finance equipment related to the expansion of a healthcare facility located in a moderate-income geography. The new facility will primarily serve low-income patients and will create both construction and permanent jobs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Colorado Springs MSA and Fort Collins MSA was consistent with the bank's performance in the full-scope area. Performance in the non-MSA Colorado AA was weaker than the bank's performance in the full-scope area due to a lack of investments or donations in the AA. The bank's performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Colorado. The bank made one donation totaling \$750,000 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This donation promoted community services to low- and moderate-income individuals and funded a mortgage foreclosure prevention program.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$28.4 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included four LIHTCs totaling \$19.3 million and one NMTC totaling \$9.1 million.

SERVICE TEST

The bank's performance under the Service Test in the state of Colorado is rated Outstanding. Performance in the limited-scope AAs supported the Service Test conclusion for the state of Colorado.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Denver CSA	87.4	87	79.8	5.8	17.2	36.8	36.8	3.4	4.9	25.4	36.1	32.5	1.0
Limited-Scope													
Colorado Springs MSA	6.5	10	9.2	0.0	30.0	30.0	40.0	0.0	1.9	25.2	39.1	33.2	0.7
Fort Collins MSA	5.5	8	7.3	0.0	37.5	50.0	12.5	0.0	1.7	18.3	61.4	18.7	0.0
Non-MSA CO	0.6	4	3.7	0.0	25.0	0.0	75.0	0.0	0.0	2.1	39.1	58.9	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was below the percentage of the population living within those geographies. The Denver CSA branch distribution was impacted by the 2020 Census new income designations. Two low-income branches and six moderate-income branches were reclassified, which lowered the bank's low- and moderate-income branch distribution. Examiners further considered 27 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 18 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Denver CSA included three Community Branches, of which one was in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 215 deposit-taking ATMs in the AA, of which 4.7 percent were in low-income geographies and 22.8 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Denver CSA	10	14	0	-2	-7	5	0
Limited-Scope							

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Colorado Springs MSA	2	5	0	0	-2	-1	0
Fort Collins MSA	0	2	0	-1	0	-1	0
Non-MSA CO	3	0	0	0	1	2	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							
<i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

To the extent changes have been made, the bank's opening and closing of branches generally 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 10 branches, none of which were in low-or moderate-income geographies. The bank closed 14 branches, none of which were in low-income geographies and two were in moderate-income geographies. The branch closures were the result of reduced customer usage and proximity to other JPMCB locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were 46 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Denver CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 2,894 qualified CD service activities to 33 organizations, for a total of 3,513 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 66 hours participating on boards and committees for three different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy, legal services, and credit counseling.

Service activities during the evaluation period include:

- A bank employee provided 24 hours of board service to a nonprofit organization that supports low- and moderate-income residents in the metro Denver area in creating sustainable, food-producing, neighborhood community gardens.
- JPMCB legal employees spent 10,354 hours providing 560 legal assistance services to 13,234 individuals in low- and moderate-income communities. These services were responsive to the need for low-cost legal services in low- and moderate-income communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Colorado Springs MSA, Fort Collins MSA, and non-MSA Colorado AA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the bank's overall performance under the Service Test.

State of Connecticut

CRA rating for the state of Connecticut¹⁶: High 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AA. Investments in the broader statewide or regional areas had a positive impact on the overall conclusion.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Connecticut

Examiners assessed performance in one AA in the state of Connecticut rating area. This was comprised of a portion of the Hartford-East Hartford-Middletown (Hartford) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Connecticut is JPMCB's 41st largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$302.6 million in deposits in the state of Connecticut rating area, of which approximately \$284.7 million represent retail branch deposits. As of December 31, 2023, the bank operated 13 branches and 46 deposit taking ATMs in the rating area, representing 0.3 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$693.8 million in loans, or 0.1 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 24 banks operating 249 branches in the state rating area JPMCB ranked 14th in deposit market share with 0.6 percent. Primary competitors include Bank of America with 48.9 percent deposit market share, Manufacturers and Traders Trust Company with 13.3 percent and Webster Bank with 10.3 percent.

The Hartford MSA AA consists of Hartford and Tolland counties. JPMCB operated 12 branches in the AA and operated 46 deposit-taking ATMs in the AA, as of June 30, 2023.

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.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Hartford MSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Hartford MSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	253	17.4	16.2	35.2	29.2	2.0
Population by Geography	1,048,891	14.1	15.7	36.2	32.5	1.5
Housing Units by Geography	432,836	14.9	16.9	37.4	30.8	0.0
Owner-Occupied Units by Geography	263,880	4.2	12.5	42.0	41.3	0.0
Occupied Rental Units by Geography	136,949	31.9	24.2	30.6	13.2	0.1
Vacant Units by Geography	32,007	29.7	21.1	29.3	19.8	0.1
Businesses by Geography	120,408	11.6	14.7	38.7	34.6	0.4
Farms by Geography	3,344	4.8	10.5	39.8	44.9	0.0
Family Distribution by Income Level	263,605	23.2	16.7	20.8	39.3	0.0
Household Distribution by Income Level	400,829	26.6	14.9	17.3	41.2	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$88,016	Median Housing Value			\$231,692
			Median Gross Rent			\$995
			Families Below Poverty Level			8.2%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Hartford MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	267	14.6	18.0	38.2	26.6	2.6
Population by Geography	1,049,286	11.4	17.8	39.7	30.4	0.6
Housing Units by Geography	440,380	12.3	18.8	41.0	27.8	0.1
Owner-Occupied Units by Geography	267,044	3.5	13.5	45.8	37.3	0.0
Occupied Rental Units by Geography	142,686	26.4	27.6	33.8	12.1	0.1
Vacant Units by Geography	30,650	23.4	23.9	32.5	19.2	1.0
Businesses by Geography	153,001	10.4	16.6	43.5	29.1	0.3
Farms by Geography	4,101	5.2	11.4	43.8	39.6	0.0
Family Distribution by Income Level	262,246	23.1	16.8	20.8	39.3	0.0
Household Distribution by Income Level	409,730	26.1	15.3	16.9	41.7	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Hartford MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$101,543	Median Housing Value			\$239,336
			Median Gross Rent			\$1,147
			Families Below Poverty Level			7.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Hartford MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Hartford MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Hartford MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$1,100 according to 2015 ACS data and \$1,269 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,760 according to 2015 ACS data and \$2,031 according to 2020 Census data. The monthly mortgage payment for the median home in the Hartford MSA would be \$1,244 using 2015 ACS data and \$1,285 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 47.9 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Hartford MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Hartford MSA, 8.2 percent of families had incomes below the FPL according to the 2015 ACS and 7 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Hartford MSA was 3.8 percent compared to the state of Connecticut at 3.9 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Hartford area had a well-educated workforce and above-average wages, lower living and business costs than Boston or New York, and housing that was generally affordable. The area's weaknesses included exposure to job losses in state government, negative net migration, and high energy costs. As

the state capital, the area had an above-average reliance on government jobs. A tight labor market combined with high inflation made it more challenging to recruit new workers for government jobs as people seek higher-paying employment in the private sector. The area had an above-average reliance on manufacturing bolstered by the presence of jet engine maker Pratt & Whitney. The area also had a significant concentration of insurance firms. House price appreciation remained elevated due to low inventory but was decelerating more rapidly than it was nationally as persistent out migration was curbing demand.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on areas such as community and economic development, affordable housing, social service needs, and local government. Contacts noted that it is difficult for smaller nonprofits to obtain credit or get bankers to serve on their boards and there is a need for greater support of small businesses. Area housing stock is aging, and many homeowners need energy assistance funding to both heat and weatherize their homes. Contacts noted that many low-income individuals need hands-on financial coaching and access to affordable bank accounts. Contacts would like to see more financial institutions participate in BankOn initiatives. Contacts also indicated that the area needs large-scale redevelopment projects to help spur economic growth and job creation. Other needs identified in the area include:

- Small Business Loans
- Employment Training
- Funding to support credit repair and credit building programs
- Financial Education
- Access to affordable bank accounts
- Access to affordable child-care services
- Access to affordable and reliable transportation options.

The area is served by several nonprofit organizations, community-based organizations, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in State of Connecticut

Examiners selected the Hartford MSA for full-scope review. There were no other AAs within the state of Connecticut. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

The bank's performance under the Lending Test in the state of Connecticut is rated High Satisfactory. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Hartford MSA	2,097	9,519	90	7	11,713	100.0	100.0
Broader Statewide/Regional Area							
Direct Benefit				1	1	0.0	
Indirect Benefit				4	4	0.0	
Total	2,097	9,519	90	12	11,718	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Hartford MSA	542,191	108,228	992	37,360	688,771	99.3	100.0
Broader Statewide/Regional Area							
Direct Benefit				650	650	0.1	
Indirect Benefit				4,471	4,471	0.6	
Total	542,191	108,228	992	42,481	693,892	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.6 percent. The bank ranked 14th among 24 depository financial institutions placing it in the top 59 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked 45th among 476 home mortgage lenders in the AA, which placed it in the top 10 percent of lenders. The top three lenders were American Eagle Federal Credit Union (5.4 percent), Rocket Mortgage (5.3 percent), and Webster Bank (5.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 105 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (24.1 percent), Bank of America (9.9 percent), and U.S. Bank (9.7 percent).

In overall small loans to farms for 2022, the bank had a market share of 25.4 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 9 small farm lenders in the AA, which placed it in the top 23 percent of lenders. The other top lenders were U.S. Bank (30.1 percent), Capital One (14.3 percent), and Bank of America (10.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and middle-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not make any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank did not make any small loans to farms in either low- or moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Connecticut 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due a lower distribution of small loans to farms with gross annual revenues of \$1 million or less.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made seven CD loans totaling \$37.4 million, which represented 126.9 percent of the allocated tier 1 capital. By dollar volume, 84 percent of the bank's CD loans funded community services targeted to low- and moderate-income individuals, while 16 percent funded revitalization and stabilization efforts. Of the total CD loans, six were PPP loans totaling \$6.2 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period also included a \$31.2 million loan to a local school district to support capital improvement projects. According to the National Center for Education Statistics, 75 percent of the students are eligible for the Federal Free or Reduced Lunch Program.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 234 loans in the amount of \$38 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	46	7,432
Federal Housing Administration (FHA)	10	2,305
Chase Homebuyer Grant Loans	38	7,703
Homebuyer Education Grants	26	13
Home Lending SPCP	5	1,228
Community Lending Program (Correspondent SPCP)	7	1,912
Veteran's Administration (VA)	1	332
Business Card SPCP	21	101
Business Banking SPCP	9	728

Loan Type	Number of Loans	Dollar Amount (\$000s)
Small Business Administration (SBA)	1	105
Paycheck Protection Program (PPP)	70	16,165
Total	234	38,024

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Connecticut.

The bank made one CD loan totaling \$650,000 to a borrower in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$4.5 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Connecticut is rated Outstanding. Investments in the broader statewide or regional areas had a positive impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 27.8 percent of allocated tier 1 capital. Of the total qualified investments, the bank current period investments consisted of five grants and donations, totaling \$510,000 to an organization.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Hartford MSA	10	7,672	5	510	15	50.0	8,182	13.8	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Statewide/Regional Area										
Direct Benefit	0	0	10	11,990	10	33.3	11,990	20.3	0	0
Indirect Benefit	1	98	4	38,882	5	16.7	38,980	65.9	0	0
Total	11	7,770	19	51,382	30	100.0	59,153	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited adequate responsiveness to credit and community economic development needs. By dollar volume, 93.8 percent of investments were prior-period LIHTC that supported affordable housing and 6.2 percent investments funded community services to low- and moderate-income individuals.

The bank did not use innovative and/or complex investments to support CD initiatives. During the evaluation period, the bank made five grants totaling \$510,000 to an educational nonprofit to fund training and career services for low-income high school students and at-risk young adults. Participants receive classroom instruction and placement in various employment sectors, including human services, education, government, or nonprofit.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas had a positive impact on the rating for the state of Connecticut. The bank made 10 investments totaling \$12 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. These investments promoted community services to low- and moderate-income individuals, economic development, and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$39 million of current- and prior-period investments in the broader statewide or regional areas that include the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments were LIHTC investments supporting 360 affordable housing units.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Hartford MSA	100.0	13	100.0	0.0	15.4	53.8	30.8	0.0	11.4	17.8	39.7	30.4	0.6
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered seven branches located in middle- or upper-income geographies that serve residents of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 46 deposit-taking ATMs in the AA, of which 2.2 percent were in low-income geographies and 15.2 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Hartford MSA	11	0	0	2	6	3	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 11 branches, none of which were in low-income geographies and two in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Hartford MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 721 qualified CD service activities to 18 organizations, for a total of 933 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with technical assistance, financial literacy, and credit counseling.

Service activities during the evaluation period include:

- A bank employee provided two hours of board services to a nonprofit public education, research, and policy development organization that works to end poverty and engage and empower all families in Connecticut to build a secure future.
- A bank employee provided six financial education sessions, totaling 12 hours, attended by 75 low- and moderate-income individuals. This service was in partnership with a nonprofit organization that focused on low-income children and families.

State of Florida

CRA rating for the state of Florida: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Florida

Examiners assessed performance in ten AAs in the state of Florida rating area. These were comprised of the entire Tampa-St. Petersburg-Clearwater, FL (Tampa Bay) MSA, Ocala, FL (Ocala) MSA, and Palm Bay-Melbourne-Titusville, FL (Palm Bay) MSA, a majority of the Miami-Port St. Lucie-Fort Lauderdale, FL (Miami) CSA, Cape Coral-Fort Myers-Naples, FL (Cape Coral) CSA, North Port-Sarasota, FL North Port (CSA), and Orlando-Lakeland-Deltona, FL (Orlando) CSA, a majority of the Jacksonville, FL (Jacksonville) MSA, and portions of the Gainesville, FL (Gainesville) CSA and Tallahassee, FL (Tallahassee) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Florida is JPMCB's fifth largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$74.9 billion in deposits in the state of Florida rating area, of which approximately \$72 billion represent retail branch deposits. As of December 31, 2023, the bank operated 411 branches and 1,410 deposit taking ATMs in the state rating area, representing 8.4 percent of total branches and 9 percent of total ATMs. The bank originated and purchased approximately \$34.8 billion in loans, or 5.5 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 163 banks operating 3,791 branches in the state rating area. JPMCB ranked fourth in deposit market share with 9.4 percent. Primary competitors include Bank of America with 21 percent deposit market share, Wells Fargo Bank with 11.8 percent, and Truist Bank with 9.7 percent.

Miami CSA

The Miami CSA AA consists of Broward, Indian River, Martin, Miami-Dade, Palm Beach, and St. Lucie counties. According to FDIC Deposit Market Share Data as of June 30, 2023, there were 82 banks operating 1,444 branches in the AA. JPMCB operated 187 branches and was ranked second in deposit market share with 12.7 percent. Primary competitors include Bank of America with 17.3 percent, Wells Fargo Bank with 12.4 percent, and Citibank with 7.3 percent. As of December 31, 2023, the bank operated 688 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Miami CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Miami CSA 2020-2021						
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	1,775,471	4.1	21.9	29.5	43.3	1.2

Farms by Geography	25,084	4.8	25.2	32.4	37.3	0.4
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				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Miami CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,653	5.1	25.7	31.3	33.8	4.0
Population by Geography	6,785,778	4.5	27.4	32.8	33.8	1.5
Housing Units by Geography	2,854,317	4.6	26.7	32.1	35.3	1.4
Owner-Occupied Units by Geography	1,489,040	2.7	21.3	33.7	41.2	1.1
Occupied Rental Units by Geography	928,056	7.7	37.0	31.7	21.9	1.7
Vacant Units by Geography	437,221	4.2	23.0	27.4	43.4	1.9
Businesses by Geography	2,402,669	2.9	22.3	29.9	42.3	2.6
Farms by Geography	31,813	3.9	24.9	31.4	38.3	1.4
Family Distribution by Income Level	1,578,272	22.1	17.8	18.3	41.8	0.0
Household Distribution by Income Level	2,417,096	24.6	16.1	16.9	42.4	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$73,430	Median Housing Value			\$313,585
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$60,666	Median Gross Rent			\$1,430
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$68,546	Families Below Poverty Level			10.3%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$72,001				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$79,785				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Miami CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Miami CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Miami CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$616 to \$824 according to 2015 ACS data and from \$758 to \$997 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$985 to \$1,318 according to 2015 ACS data and ranging from \$1,213 to \$1,596 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Miami CSA would be \$1,191 using 2015 ACS data and \$1,683 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 71.4 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Miami MD. Increases ranged from 63.9 percent to 73.7 percent for other components of the Miami CSA. This acceleration in home prices creates new affordability concerns in the Miami CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Miami CSA, 13.2 percent of families had incomes below the FPL according to the 2015 ACS and 10.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for Miami CSA was 2.4 percent compared to the state of Florida at 2.9 percent and the national unemployment rate of 3.5 percent.

Economic Data

Fort Lauderdale-Pompano Beach-Sunrise, FL (Fort Lauderdale) MD

The Fort Lauderdale MD's economy grew rapidly, allowing job growth to outpace the state of Florida. Net job creation ranked among the top ten metro areas nationally, with nearly every major industry contributing to payroll increases. The unemployment rate remained low, even as the labor force expanded, leading to a competitive job market and above-average wage growth. Higher mortgage rates raised financing costs, resulting in a modest decline in house prices. Median sales prices held steady, but properties lingered longer on the market and often sold below asking prices. Residents who did not own homes before the pandemic continued to face high housing costs. Housing affordability posed challenges in building a workforce to sustain job growth. Net migration had initially increased at the pandemic's onset but has since slowed. Tourism benefitted from a post-pandemic surge in visitors, with hotel occupancy rates exceeding pre-pandemic levels and average room rates increasing significantly.

Nonetheless, the tourism sector faced challenges from a rising dollar, which discouraged overseas visitors, and inflation, which reduced disposable income for vacations.

Miami-Miami Beach-Kendall, FL (Miami) MD

The Kendall MD's economy experienced a slowdown, with net job creation falling below the Florida average. The unemployment rate edged up and the labor force contracted slightly, limiting hiring, particularly in lower-wage sectors like leisure and hospitality. While finance payrolls thrived due to an influx of investment firms during the pandemic, construction employment declined, and government jobs fell. The tight labor market and strong job creation in higher-wage industries drove rapid wage growth, raising the MD's average weekly income above the U.S. average. The area's heavy reliance on tourism made it vulnerable to economic fluctuations. Tighter financial conditions impacted demand for vacations, although revenue from hotel and short-term rental taxes surged. Home prices fared better than those in many large metro areas amidst rising mortgage rates. Reduced affordability slowed demand, with homes taking longer to sell and often selling below asking prices. The multifamily market also faced challenges, as permitting decreased and rent growth slowed. The area experienced weak population growth, which constrained both the housing market and broader hiring. The MD's high living costs led to population growth significantly below the Florida average and losses recorded in recent years.

West Palm Beach-Boca Raton-Boynton Beach, FL (West Palm Beach) MD

The economy of the West Palm Beach MD improved, with job growth outpacing both the national average and that of Florida. Hiring in leisure/hospitality and healthcare increased. An influx of new workers into the labor force contributed to this growth, resulting in a record low unemployment rate. The demand for beach vacations had boosted the tourism industry. However, higher fuel prices and inflation impacted travelers' budgets, reducing visitor numbers. Rising labor costs prompted businesses to slow hiring. The MD experienced a dramatic rise in home prices, placing it among the top ten metro areas for price increases. Cash buyers helped shield the market from higher mortgage rates. Demand weakened, as higher inventory and longer selling times became evident. Population growth slowed, particularly affecting prime working-age residents, which made the economy increasingly reliant on retirees. With one in four residents over the age of 65, the MD had the highest concentration of retirees among Florida's large metro areas.

Port St. Lucie, FL (Port St. Lucie) MSA

Port St. Lucie's economy experienced solid growth, with nonfarm employment surpassing pre-pandemic levels. Significant contributions came from healthcare and leisure/hospitality, although retail trade and transportation/utilities showed some slowdown. The labor market remained exceptionally strong, with an unemployment rate below pre-pandemic levels and a rapidly expanding labor force. Single-family home price appreciation cooled but still outpaced both state and national averages. Permitting activity has also declined. Healthcare employment growth played a crucial role in the area's economic expansion. The area's increasing labor force allowed healthcare providers to expand payrolls at a rate above the national average. The leisure/hospitality sector also grew, as the area's favorable climate and beaches attracted year-round visitors. Population growth exceeded state and national averages. The MSA had become one of the fastest-growing metro areas, particularly appealing to retirees and prime working-age residents due to its quality of life, natural amenities, and absence of a state income tax.

Sebastian-Vero Beach, FL (Sebastian) MSA

The Sebastian MSA's economy showed signs of softening but performed well overall. Recent employment growth weakened, causing the metro area's recovery to lag both Florida and national trends. Professional and business services led job gains, fully recovering from pandemic-related losses, while leisure and hospitality experienced setbacks. The housing market remained extremely robust, with single-family home price growth significantly outpacing national trends. The tourism sector played a crucial role in the area's transition from recovery to expansion. Tourism tax revenues increased, and hotel occupancy rates improved. Healthcare also remained vital to the area's economic outlook, employing around one in five workers. Labor supply challenges hindered job recovery. The rapidly growing senior population drove demand for health services.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the area. These organizations focus on affordable housing, community services and revitalization. Contacts noted that Miami needs access to capital, especially for small businesses and affordable rental housing for low and moderate-income individuals. Credit and CD needs identified include:

- Affordable housing
- Small business lending
- Redevelopment in distressed areas including commercial corridors

Opportunities for participation by financial institutions include the following:

- Small business access to credit
- Consumer access to credit
- Affordable multifamily housing finance
- Financial education

Tampa MSA

The Tampa MSA AA consists of Hernando, Hillsborough, Pasco, and Pinellas counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 53 banks operating 599 branches in the AA. JPMCB operated 61 branches and ranked fifth in deposit market share with 5.9 percent. Primary competitors include Raymond James Bank with 31.1 percent deposit market share, Bank of America with 12.8 percent, and Truist Bank with 11.8 percent. As of December 31, 2023, the bank operated 191 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Tampa MSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Tampa MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	746	5.5	26.1	36.3	29.8	2.3
Population by Geography	2,888,458	4.5	24.4	38.0	32.7	0.4
Housing Units by Geography	1,368,924	4.3	25.4	39.2	30.9	0.2
Owner-Occupied Units by Geography	737,411	1.9	21.9	39.7	36.5	0.1
Occupied Rental Units by Geography	408,090	8.5	29.3	38.6	23.2	0.4
Vacant Units by Geography	223,423	4.7	30.0	38.8	26.3	0.1
Businesses by Geography	538,242	4.2	20.7	34.1	40.7	0.3
Farms by Geography	12,646	3.1	24.8	38.9	33.1	0.1
Family Distribution by Income Level	702,244	21.6	17.9	19.1	41.4	0.0
Household Distribution by Income Level	1,145,501	24.0	16.3	17.5	42.2	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$155,283
			Median Gross Rent			\$979
			Families Below Poverty Level			11.2%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Tampa MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	788	4.7	27.9	36.7	27.5	3.2
Population by Geography	3,175,275	3.8	26.2	37.5	31.5	1.0
Housing Units by Geography	1,436,297	3.8	27.2	37.7	30.1	1.2
Owner-Occupied Units by Geography	815,666	1.7	24.4	38.7	34.8	0.5
Occupied Rental Units by Geography	423,683	7.6	31.6	37.0	21.7	2.2
Vacant Units by Geography	196,948	4.5	29.5	35.4	28.6	2.0
Businesses by Geography	737,738	3.1	21.2	33.1	40.7	1.8
Farms by Geography	16,337	2.8	27.2	39.0	30.4	0.6
Family Distribution by Income Level	762,610	21.1	18.3	19.2	41.4	0.0
Household Distribution by Income Level	1,239,349	23.4	16.8	17.5	42.3	0.0

Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA	\$71,769	Median Housing Value	\$221,635
		Median Gross Rent	\$1,184
		Families Below Poverty Level	9.0%
<i>Source: 2020 U.S. Census and 2023 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>			

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Tampa MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Tampa MSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Tampa CSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$736 according to 2015 ACS data and \$897 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,178 according to 2015 ACS data and \$1,435 according to 2020 Census data. The monthly mortgage payment for the median home in the Tampa CSA would be \$834 using 2015 ACS data and \$1,190 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 72.4 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Tampa CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Tampa CSA, 11.2 percent of families had incomes below the FPL according to the 2015 ACS and 9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Tampa MSA was 3.1 percent compared to 2.9 percent for the state of Florida and the national unemployment rate of 3.5 percent.

Economic Data

Tampa serves as the financial services capital of Florida, with low taxes and strong tourism listed as its strengths. Housing affordability was the primary weakness, in part due to rising mortgage rates and its expensive housing market. Tampa saw population growth due to weather, cost of living, and employment opportunities. Year-over-year job growth remained in line with that of Florida and comfortably ahead of both the South and the rest of the country. Strength in the labor market was broad-based, with consumer industries driving employment gains. Unemployment rate was below its previous cyclical low, even as strong demographic trends have pushed the labor force far above its pre-pandemic

levels. The housing market was expected to struggle after years of significant growth. Affordability concerns chipped away at demand, exacerbating the impact of rapidly rising mortgage rates to drive a steep drop in house prices since last summer. Population growth ranked in the top quartile of metro areas nationally.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the area. These organizations focus on affordable housing and economic development. Contacts noted that Tampa needs support for small businesses and development in distressed communities.

Credit and CD needs identified include:

- Affordable housing
- Small business lending
- Redevelopment in distressed areas

Opportunities for participation by financial institutions include small business and microenterprise access to credit, affordable housing construction revolving lines of credit, and post-construction permanent financing for rehabilitated affordable housing.

Scope of Evaluation in state of Florida

Examiners selected the Miami CSA for full-scope review, as it represented the largest concentration of deposits and branches in the state of Florida. Examiners further selected the Tampa MSA for full-scope review as it has a relatively high concentration of deposits, lending, and branches relative to the other AAs and has not recently received a full-scope review. The CSA and MSA combined account for 69.3 percent of the bank's adjusted deposits and 62.2 percent of lending in the state. The Sarasota and Orlando CSAs and the Cape Coral, Gainesville, Jacksonville, Ocala, Palm Bay, and Tallahassee MSAs received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Gainesville and Tallahassee MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for those AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN STATE OF FLORIDA

LENDING TEST

The bank's performance under the Lending Test in the state of Florida is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in both the Miami CSA and the Tampa MSA was excellent.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Miami CSA	21,440	213,113	1,569	125	236,247	47.8	59.6
Tampa MSA	10,005	60,881	508	24	71,418	14.4	9.7
Limited-Scope							
Cape Coral CSA	4,541	22,286	224	4	27,055	5.5	5.1
Gainesville MSA	442	3,020	66	0	3,528	0.7	0.3
Jacksonville MSA	3,497	19,770	135	7	23,409	4.7	2.2
Sarasota CSA	4,434	21,482	179	7	26,102	5.3	5.0
Ocala MSA	825	3,186	202	0	4,213	0.9	0.5
Orlando CSA	10,986	76,462	636	39	88,123	17.8	15.0
Palm Bay MSA	2,077	9,399	79	2	11,557	2.3	2.4
Tallahassee MSA	389	2,422	39	1	2,851	0.6	0.2
Broader Statewide/Regional Area							
Direct Benefit				5	5	0.0	
Indirect Benefit				7	7	0.0	
Total	58,636	432,021	3,637	221	494,515	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Miami CSA	13,644,653	4,018,709	21,249	776,640	18,461,251	52.9	59.6
Tampa MSA	3,289,278	972,647	5,510	128,653	4,396,088	12.6	9.7
Limited-Scope							
Cape Coral CSA	2,250,678	350,437	2,629	3,964	2,607,708	7.5	5.1
Gainesville MSA	135,130	37,755	621	0	173,506	0.5	0.3
Jacksonville MSA	1,158,556	283,106	1,403	45,111	1,488,176	4.3	2.2
Sarasota CSA	1,616,532	350,428	2,045	25,827	1,994,832	5.7	5
Ocala MSA	163,453	40,852	2,353	0	206,658	0.6	0.5
Orlando CSA	3,201,108	1,232,477	7,652	140,154	4,581,391	13.1	15.0
Palm Bay MSA	627,733	173,129	863	1,052	802,777	2.3	2.4
Tallahassee MSA	89,291	27,473	387	15,000	132,151	0.4	0.2

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Broader Statewide/Regional Area							
Direct Benefit				5,200	5,200	0.0	
Indirect Benefit				47,802	47,802	0.1	
Total	26,176,412	7,487,013	44,712	1,189,403	34,897,540	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Miami CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 12.7 percent. The bank ranked second among 82 depository financial institutions placing it in the top 3 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranked ninth among 1,153 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders were United Wholesale Mortgage (9.3 percent), Rocket Mortgage (6.1 percent), and Crosscountry Mortgage (2.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 16.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 242 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (31.1 percent), Bank of America (15.7 percent), and Citibank (5.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 48.9 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 22 small farm lenders in the AA. The other top lenders were Bank of America (16.3 percent), U.S. Bank (12.1 percent), and Wells Fargo Bank (12 percent).

Tampa MSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 5.9 percent. The bank ranked fifth among 53 depository financial institutions placing it in the top 10 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 22nd among 1,128 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders were United Wholesale Mortgage (7.4 percent), Rocket Mortgage (6.8 percent), and Suncoast Credit Union (3.6 percent).

In overall small loans to businesses for 2022, the bank had a market share of 17.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 187 small

business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (27.1 percent), Bank of America (11.5 percent), and Capital One (7.1 percent).

In overall small loans to farms for 2022, the bank had a market share of 49.6 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 16 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (11.3 percent), Capital One (11.1 percent), and Bank of America (10.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in the Miami CSA and Tampa CSA.

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.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

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.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

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.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and was near to the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes in Miami CSA and Tampa CSA.

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.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Miami CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Tampa MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Miami CSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 125 CD loans totaling \$776.6 million, which represented 17.5 percent of the allocated tier 1 capital. By dollar volume, 61.7 percent funded affordable housing, 38.2 percent funded revitalization and stabilization efforts, and 0.1 percent funded economic development. Of the total CD loans, the bank made 82 PPP loans totaling \$46.3 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$101 million loan to fund a new 465-unit housing development in a low-income geography. Of the units, 90 are restricted to families who earn 50 percent or less of the AMI while 11 units are restricted to workforce housing. This project is part of a government plan for revitalization or stabilization for future growth.
- A \$49 million loan for an affordable housing project for a 315-unit senior public housing development. All the units are rent-restricted for elderly residents who earn 60 percent or less of the AMI.

Tampa MSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 24 CD loans totaling \$128.6 million, which represented 17.8 percent of the allocated tier 1 capital. By dollar volume, 36 percent of these loans funded affordable housing, 0.1 percent funded economic development, 4.6 percent funded revitalization and stabilization efforts, and 59.3 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 17 PPP loans totaling \$6 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$45.7 million line of credit to a school district to purchase buses, computers, related technology as part of the bank's community service. According to the National Center for Education Statistics, 53.9 percent of school students in the district are eligible for the Federal Free or Reduce Lunch Program.
- A \$14.5 million construction loan to stabilize an apartment complex which will provide affordable housing for 112 units. Seventy-nine units are set aside for homeless individuals and families. The project utilized complex funding sources, including LIHTCs and loans from local housing corporations and governments.

Product Innovation and Flexibility

Miami CSA

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 26,738 loans in the amount of \$2.2 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	465	70,346
Federal Housing Administration (FHA)	94	25,167
Chase Homebuyer Grant Loans	537	116,157
Homebuyer Education Grants	206	103

Loan Type	Number of Loans	Dollar Amount (\$000s)
Home Lending SPCP	550	194,682
Community Lending Program (Correspondent SPCP)	448	163,105
Veteran's Administration (VA)	30	11,559
VA Purchase Closing Credit	13	5,394
Business Card SPCP	1,691	6,870
Business Banking SPCP	1,766	188,661
Small Business Administration (SBA)	245	59,300
Paycheck Protection Program (PPP)	20,693	1,371,904
Total	26,738	2,213,248

Tampa MSA

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 5,082 loans in the amount of \$460.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	300	47,868
Federal Housing Administration (FHA)	59	14,610
Chase Homebuyer Grant Loans	306	70,096
Homebuyer Education Grants	142	71
Home Lending SPCP	57	17,798
Community Lending Program (Correspondent SPCP)	104	29,745
Veteran's Administration (VA)	26	8,467
VA Purchase Closing Credit	9	3,087
Business Card SPCP	111	415
Business Banking SPCP	100	10,001
Small Business Administration (SBA)	78	19,354
Paycheck Protection Program (PPP)	3,790	238,550
Total	5,082	460,062

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Florida.

The bank made five CD loans totaling \$5.2 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered an additional \$47.8 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Orlando CSA and the Tallahassee MSA was consistent with the bank's performance in the full-scope area. Performance in the Cape Coral CSA, Gainesville MSA, Jacksonville MSA, North Port CSA, Ocala MSA, and Palm Bay MSA was weaker than the bank's performance in the full-scope area due to a lower geographic distribution of loans and/or CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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 Outstanding. Performance in the limited-scope AAs and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami CSA was excellent and the Tampa MSA was good.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Miami CSA	82	122,741	80	290,124	162	56.5	412,865	39.3	5	362
Tampa MSA	14	45,536	10	42,475	24	8.4	88,011	8.4	0	0
Limited-Scope										
Cape Coral CSA	0	0	8	45	8	2.8	45	0.0	0	0
Gainesville MSA	3	2,371	3	28,730	6	2.1	31,101	3.0	0	0
Jacksonville MSA	3	13,729	9	30,257	12	4.2	43,985	4.2	0	0
Sarasota CSA	0	0	5	102,747	5	1.7	102,747	9.8	0	0
Ocala MSA	0	0	0	0	0	0.0	0	0.0	0	0
Orlando CSA	9	21,495	24	200,508	33	11.5	222,003	21.1	0	0
Palm Bay MSA	1	255	2	26,455	3	1.1	26,709	2.5	0	0
Tallahassee MSA	1	6,053	4	49,557	5	1.7	55,610	5.3	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Statewide/Regional Area										
Direct Benefit	0	0	18	11,632	18	6.3	11,632	1.1	0	0
Indirect Benefit	7	9,800	4	46,428	11	3.8	56,228	5.4	0	0
Total	120	221,979	167	828,957	287	100.0	1,050,936	100.0	5	362
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

Miami CSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.3 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 49 grants and donations, totaling \$17.3 million to 31 organizations.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 94.8 percent of investments supported affordable housing, 4.4 percent funded community services to low- and moderate-income individuals, and 0.8 percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. The bank made 10 LIHTC investments totaling \$171.3 million that supported 2,159 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$33 million LIHTC investment for the substantial rehabilitation of a 315-unit public housing development. A HUD rental assistance program contract will cover 237 units, and the remaining 78 units will be covered by a Section 8 HAP contract.
- Three grants totaling \$512,500 to a local foundation to support an innovative summer internship program that provides work-based learning experiences to predominately low- and moderate-income students in the AA. The program seeks to enhance the students technical and workplace readiness skills while building relationships in local industry to increase opportunities for equitable access and exposure to productive career pathways.

Tampa MSA

The bank had an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 12.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made five grants and donations, totaling \$950,000 to four organizations.

The bank exhibited adequate responsiveness to credit and community economic development needs. By dollar volume, 98.9 percent of investments supported affordable housing and 1.1 percent funded community services to low- and moderate-income individuals.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment, totaling \$14 million that supported 123 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$7.2 million investment for a 160 affordable unit project in a low-income census tract, of which seven percent of the units will be set aside for those with disabilities. The bank invested in a housing bond, where proceeds will be used to make the mortgage loan for this project.
- A \$250,000 grant to an organization to support an initiative to help create jobs in economically distressed areas and to secure new projects and investments. The grant was part of the initiative's complex financing structure consisting of funding from local partners and other financial institutions.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Gainesville MSA, Jacksonville MSA, Sarasota CSA, Orlando CSA, Palm Bay MSA, and Tallahassee MSA was consistent with the bank's performance in the full-scope areas. The bank's performance in the Cape Coral CSA and Ocala MSA was weaker than the bank's performance in the full-scope areas due to a lower volume of qualified investments in these AAs. Performance in the limited-scope AAs had a neutral impact on the overall Investment Test conclusion for the state of Florida.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Florida. The bank made 18 investments totaling \$11.6 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals, revitalization and stabilization efforts, economic development, and affordable housing.

Additionally, because JPMCB was responsive to CD needs and opportunities in its AAs, examiners considered \$56.3 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments were all LIHTC investments that supported 1,059 affordable units.

SERVICE TEST

The bank's performance under the Service Test in the state of Florida is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Florida.

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Miami CSA	59.6	187	45.5	3.7	19.3	33.2	42.2	1.6	4.5	27.4	32.8	33.8	1.5
Tampa MSA	9.7	61	14.8	1.6	19.7	41.0	36.1	1.6	3.8	26.2	37.5	31.5	1.0
Limited-Scope													
Cape Coral CSA	5.1	26	6.3	0.0	11.5	50.0	38.5	0.0	3.9	23.0	44.6	27.5	1.0
Gainesville MSA	0.3	5	1.2	0.0	20.0	40.0	40.0	0.0	6.8	18.5	29.2	38.1	7.5
Jacksonville MSA	2.2	20	4.9	0.0	10.0	25.0	60.0	5.0	5.0	25.1	39.9	29.5	0.6
Sarasota CSA	5.0	28	6.8	0.0	7.1	57.1	35.7	0.0	1.8	21.3	47.9	28.9	0.1
Ocala MSA	0.5	5	1.2	0.0	0.0	80.0	20.0	0.0	1.4	19.4	58.3	20.1	0.9
Orlando CSA	15.0	65	15.8	1.5	20.0	47.7	29.2	1.5	3.0	24.1	42.7	29.1	1.1
Palm Bay MSA	2.4	12	2.9	0.0	8.3	50.0	41.7	0.0	2.7	21.4	45.0	30.5	0.4
Tallahassee MSA	0.2	2	0.5	0.0	0.0	0.0	50.0	50.0	14.4	17.7	29.6	32.4	6.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

Miami CSA

The bank's distribution of branches in low- and moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 60 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 39 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Miami CSA included five Community Branches, of which two were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 688 deposit-taking ATMs in the AA, of which 4.1 percent were in low-income geographies and 22.4 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Tampa MSA

The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies was near to the percentage of the population living within those geographies. The Tampa MSA branch distribution was impacted by the 2020 Census new income designations, with a loss of two low-income branches, which lowered the bank's low-income branch distribution. Examiners further considered 16 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which seven were within 1,000 feet of moderate-income geographies. In addition, JPMCB branches in the Tampa MSA included three Community Branches, of which one was in a low-income geography and two were in moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 191 deposit-taking ATMs in the AA, of which 2.1 percent were in low-income geographies and 17.8 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Miami CSA	9	18	0	1	-7	-3	0
Tampa MSA	7	3	0	1	0	3	0
Limited-Scope							
Cape Coral CSA	2	3	0	0	1	-2	0
Gainesville MSA	0	0	0	0	0	0	0
Jacksonville MSA	2	3	0	0	-1	0	0
Sarasota CSA	4	3	0	0	2	-1	0
Ocala MSA	0	0	0	0	0	0	0
Orlando CSA	5	8	-1	0	-1	-1	0
Palm Bay MSA	0	0	0	0	0	0	0
Tallahassee MSA	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

Miami CSA

To the extent changes have been made, 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 nine branches, of which none were in low-income geographies and four were in moderate-income geographies. The bank closed 18 branches, of which none were in low-income geographies and three were in moderate-income geographies. The branch closures were the result of proximity to other branches and low transaction volume.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were 99 locations with drive-thru facilities operating under similar hours.

Tampa MSA

To the extent changes have been made, the bank's opening and closing 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 opened seven branches, of which one was in low-income geography, and another was in a moderate-income geography. The bank closed three branches, of which one was in a low-income geography. The branch closure was the result of proximity to other branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. 5:00 p.m., Monday through Friday, and from 9:00 a.m. 2:00 p.m. on Saturdays. There were 31 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Miami CSA and Tampa CSA.

Miami CSA

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 5,159 qualified CD service activities to 118 organizations, for a total of 9,907 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by six bank employees spending 354 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy, homeownership and maintenance, and financial education.

Service activities during the evaluation period include:

- JPMCB partnered with a nonprofit to conduct first-time homebuyer seminars to 215 recipients. This effort supported down payment assistance programs that require pre-purchase education. In addition, local branches located in low- and moderate-income communities delivered homebuyer education workshops to inform the local community on the steps needed to purchase a home.
- JPMCB employees spent 504 hours mentoring 168 small businesses through the bank's Founders Forward program. JPMCB's Founders Forward Small Business Initiative provided pro bono consulting to small businesses. As part of the program, each entrepreneur was assigned a dedicated team of JPMCB volunteers who focused on addressing the entrepreneur's self-identified business challenge during an eight-week cohort.

Tampa MSA

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 2,289 qualified CD service activities to 48 organizations, for a total of 5,645 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 400 hours participating on boards and committees for four different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- JPMCB delivered monthly financial health workshops at a nonprofit that serves first-time homebuyers. JPMCB provides individuals with financial literacy, increasing their capacity to set goals, create realistic budgets, and build their credit.
- JPMCB Tampa Legal team partnered with a local nonprofit to conduct a pro bono financial institution day. The clinic provided legal services to nonprofit organizations that served underserved communities and small businesses. JPMCB employees assisted in completing necessary legal forms and provided legal assistance to nonprofits and small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral CSA, Gainesville MSA, Jacksonville MSA, Sarasota CSA, Ocala MSA, Orlando CSA, Palm Bay MSA and Tallahassee MSA was weaker than the bank's performance in the full-scope areas. Weaker performance was due to lower percentage of branch distributions in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies.

State of Georgia

CRA rating for the state of Georgia: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Georgia

Examiners assessed performance in two AAs in the state of Georgia rating area. These were comprised of a majority of the Atlanta-Athens-Clarke County-Sandy Springs, GA-AL (Atlanta) CSA and a portion of the Savannah MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Georgia is JPMCB's 16th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$12.6 billion in deposits in the state of Georgia rating area, of which approximately \$11.1 billion represent retail branch deposits. As of December 31, 2023, the bank operated 104 branches and 287 deposit taking ATMs in the rating area, representing 2.1 percent of total branches and 1.8 percent of total ATMs. The bank originated and purchased approximately \$8.4 billion in loans, or 1.3 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 83 banks operating 1,107 branches in the state rating area. JPMCB ranked fifth in deposit market share with 5.1 percent. Primary competitors include Truist Bank with 22.5 percent deposit market share, Bank of America with 20.6 percent, and Wells Fargo Bank with 17 percent.

Atlanta CSA

The Atlanta CSA AA consists of Barrow, Cherokee, Clarke, Clayton, Cobb, Coweta, Dekalb, Douglas, Fayette, Forsyth, Fulton, Gwinnet, Hall, Henry, Jackson, Newton, Oconee, Paulding, Rockdale, and

Walton counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 78 banks operating 1,041 branches in the AA. JPMCB operated 101 branches and ranked fifth in deposit market share with 5.2 percent. Primary competitors in the AA include Truist Bank with 22.3 percent deposit market share, Bank of America with 20.8 percent, and Wells Fargo, N.A. with 17 percent. As of December 31, 2023, the bank operated 276 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Atlanta CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Atlanta CSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	951	11.0	23.4	29.8	34.8	0.9
Population by Geography	5,457,918	7.8	23.2	33.4	35.1	0.4
Housing Units by Geography	2,159,460	8.7	23.7	32.3	35.1	0.1
Owner-Occupied Units by Geography	1,215,782	3.3	17.4	36.1	43.1	0.0
Occupied Rental Units by Geography	713,974	15.5	32.6	27.1	24.5	0.3
Vacant Units by Geography	229,704	16.5	29.7	28.5	25.2	0.2
Businesses by Geography	1,022,824	6.5	22.3	30.4	40.4	0.4
Farms by Geography	17,182	4.5	19.1	37.1	39.2	0.1
Family Distribution by Income Level	1,300,239	22.3	16.3	18.1	43.2	0.0
Household Distribution by Income Level	1,929,756	23.2	16.1	17.4	43.3	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$57,116	Median Housing Value			\$188,353
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Gross Rent			\$1,001
Median Family Income MSA - 23580 Gainesville, GA MSA		\$58,558	Families Below Poverty Level			12.0%
Median Family Income Non-MSAs - GA		\$45,886				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Atlanta CSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,480	8.0	22.0	30.8	35.7	3.6
Population by Geography	6,024,507	6.7	22.6	32.7	35.8	2.3
Housing Units by Geography	2,292,428	7.4	22.7	31.6	35.8	2.6
Owner-Occupied Units by Geography	1,347,779	3.1	17.2	35.0	43.4	1.3

Table A – Demographic Information of the Assessment Area Assessment Area: Atlanta CSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	773,089	13.7	31.3	26.8	23.8	4.4
Vacant Units by Geography	171,560	12.9	26.3	27.0	29.6	4.2
Businesses by Geography	1,430,105	5.9	21.6	29.5	40.0	3.0
Farms by Geography	23,403	4.3	20.4	37.2	36.5	1.6
Family Distribution by Income Level	1,415,627	21.1	16.8	19.3	42.8	0.0
Household Distribution by Income Level	2,120,868	23.0	16.0	17.8	43.2	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$71,301	Median Housing Value			\$256,186
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$84,791	Median Gross Rent			\$1,219
Median Family Income MSA - 23580 Gainesville, GA MSA		\$74,139	Families Below Poverty Level			8.2%
Median Family Income Non-MSAs - GA		\$55,969				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Atlanta CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Atlanta CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Atlanta CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$574 to \$842 according to 2015 ACS data and from \$700 to \$1,060 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$918 to \$1,346 according to 2015 ACS data and ranging from \$1,119 to \$1,696 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Atlanta CSA would be \$1,011 using 2015 ACS data and \$1,375 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 57.6 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Atlanta MSA. Increases ranged from 61.3 percent to 63.8 percent for other components of the Atlanta CSA. This acceleration in home prices creates new affordability concerns in the Atlanta CSA.

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 resources to qualify for home loans than those with income

above the poverty rate. Within the Atlanta CSA, 12 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Atlanta CSA was 2.8 percent compared to the state unemployment rate of 2.9 percent and the national unemployment rate of 3.5 percent.

Economic Data

Atlanta-Sandy Springs-Alpharetta, GA (Atlanta) MSA

Atlanta's economy thrived with year-over-year employment growth exceeding regional and national rates. Payroll growth was broad-based, primarily driven by white-collar industries, though construction faced year-over-year declines. Housing affordability remained an issue, with house prices declining recently and single-family permitting decreasing. The logistics industry benefited from a pandemic-driven surge in e-commerce. Shifts in consumer spending back toward services and high inflation began to erode purchasing power. Since the pandemic, transportation and warehousing payrolls significantly increased. Atlanta's tech industry drove near-term growth, benefiting from relatively low business costs and a deep talent pool. Medical services and healthcare-related industries emerged as key growth areas. Employment in healthcare surged above pre-pandemic levels, ranking highly among the largest metro areas.

Athens-Clarke County, GA (Athens) MSA

Athens's economy thrived, with total nonfarm payroll growth outpacing both regional and national averages. Broad-based strength across public and private sectors fueled this outperformance, particularly through state government hiring and robust growth in healthcare services. The area's labor market attracted new workers, with labor force growth ranking first in the South and exceeding national averages. House price appreciation in Athens ranked in the top quartile among regional metro areas, and single-family home permitting held strong compared to the U.S. average, despite elevated mortgage rates. In healthcare, several expansions at local hospitals were completed, allowing providers to grow staff at a rate in line with national averages.

Gainesville, GA (Gainesville) MSA

Gainesville's economy charted an impressive course, although growth began to moderate during the evaluation period. Service providers, particularly in education, healthcare, professional and business services, and leisure and hospitality, drove this growth while the manufacturing sector experienced a slowdown. House price gains exceeded the average, and residential construction remained significantly above pre-pandemic levels. Manufacturers added jobs at an above-average rate. Gainesville has a substantial base of food processors. The concentration of food manufacturing and low business costs positioned factory jobs for faster growth than in the state overall. Healthcare providers in the area had strong growth due to favorable demographics and location. Proximity to Atlanta continued to provide economic benefits. High-wage job opportunities in the rapidly growing metropolitan area, coupled with the acceptance of flexible work arrangements, reduced daily commutes. Migration data indicated a steady influx of new residents from Atlanta to Gainesville, attracted by cost savings and additional living space.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the area. These organizations included one affordable housing organization and three economic development organizations that help to attract and retain businesses in the area. Community contacts indicated that the following are needs identified within the community:

- Affordable housing
- Small business technical assistance
- Living wage employment
- Financial literacy/education
- Reinvestment in low- and moderate-income neighborhoods
- Down payment assistance programs for homebuyers
- Start-up business capital financing

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Down payment assistance programs
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Scope of Evaluation in State of Georgia

Examiners selected the Atlanta CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Georgia. The CSA accounts for 98.8 percent of the bank's adjusted deposits and 97.6 percent of lending in the state. The Savannah MSA received a limited-scope review. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Savannah MSA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

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. Performance in the limited-scope AA supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Atlanta CSA	16,605	100,190	546	38	117,379	97.6	98.9
Limited-Scope							
Savannah MSA	536	2,346	35	3	2,920	2.4	1.1
Broader Statewide/Regional Area							
Indirect Benefit				7	7	0.0	
Total	17,141	102,536	581	48	120,306	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Atlanta CSA	6,320,570	1,608,918	6,225	179,175	8,114,888	96.1	98.9
Limited-Scope							
Savannah MSA	186,600	29,176	342	47,936	264,054	3.1	1.1
Broader Statewide/Regional Area							
Indirect Benefit				62,079	62,079	0.7	
Total	6,507,170	1,638,094	6,567	289,690	8,441,521	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 5.2 percent. The bank ranked fifth among 78 depository financial institutions placing it in the top 7 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 23rd among 920 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Rocket Mortgage (8.2 percent), United Wholesale Mortgage (4.9 percent), and Truist Bank (3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 224 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (33.7 percent), Bank of America (11.1 percent), and Capital One (7.5 percent).

In overall small loans to farms for 2022, the bank had a market share of 28.3 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 32 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (15.4 percent), U.S. Bank (14.5 percent), and Capital One (12.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 38 CD loans totaling \$179.2 million, which represented 15.8 percent of the allocated tier 1 capital. By dollar volume, 73 percent of these loans funded affordable housing, 24.4 percent funded revitalization and stabilization efforts, 2.4 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made 23 PPP loans totaling \$9 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$30.2 million construction loan to finance a 212-unit mixed-income housing development, of which 114 units are income-restricted or subsidized and are restricted to 70 percent or less of AMI.
- A \$24.3 million construction loan to support a senior living complex, which will include 80 affordable housing units. The project will further revitalize and stabilize the area by repurposing the former site of a motor vehicle assembly plant.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 8,186 loans in the amount of \$880.5 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	423	79,432
Federal Housing Administration (FHA)	170	42,037
Chase Homebuyer Grant Loans	232	59,474
Homebuyer Education Grants	201	101

Loan Type	Number of Loans	Dollar Amount (\$000s)
Home Lending SPCP	423	121,835
Community Lending Program (Correspondent SPCP)	359	99,287
Veteran's Administration (VA)	38	14,378
VA Purchase Closing Credit	21	7,733
Business Card SPCP	558	2,096
Business Banking SPCP	248	19,937
Paycheck Protection Program (PPP)	5,513	434,223
Total	8,186	880,533

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Georgia.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$62.1 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans supported affordable housing, community service, and a PPP loan that provided relief for an organization due to the COVID-19 pandemic.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Savannah AA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall Lending Test conclusion for the state of Georgia.

Refer to Tables O through T in the state of Georgia 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 Georgia is rated Outstanding. Performance in the limited-scope AA and investments in investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 46.8 percent of allocated tier 1 capital. Of the total qualified investments, the bank made seven grants and donations, totaling \$1.4 million to five organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Atlanta CSA	25	88,449	44	440,130	69	53.5	528,579	72.2	0	0
Limited-Scope										
Savannah MSA	6	7,815	2	11,165	8	6.2	18,980	2.6	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	2	1,100	2	1.5	1,100	0.2	0	0
Indirect Benefit	34	53,081	16	130,183	50	38.8	183,264	25.0	0	0
Total	65	149,346	64	582,578	129	100.0	731,923	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 93.7 percent of investments supported affordable housing, 4 percent supported revitalization and stabilization efforts, and 2.3 percent funded community services to low- and moderate-income individuals.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 28 LIHTC investments totaling \$374.6 million that supported 4,572 affordable housing units. Additionally, the bank made four NMTC investments totaling \$19.9 million.

Qualified investments made during the evaluation period include:

- A \$12.8 million NMTC investment to construct a grocery fulfillment center in a moderate-income geography. The facility will create 400 jobs that will provide stability and advancement opportunities for area residents. The center projects to fulfill up to 65,000 grocery orders per week and serve between 300,000 and 600,000 persons annually. It will also partner with local food banks to donate unsold groceries.
- A \$11.5 million direct investment to an MDI and CDFI to support loan capacity growth, implementation of technology upgrades, talent acquisition, geographic expansion, and product expansion.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Savannah MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope area supported the overall Investment Test conclusion for the state of Georgia.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Georgia. The bank made two investments totaling \$1.1 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$183.3 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 3,837 affordable units, a HTC, and grants.

SERVICE TEST

The bank's performance under the Service Test in the state of Georgia is rated Outstanding. Performance in the limited-scope AA supported the Service Test conclusion for the state of Georgia.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Atlanta CSA	98.9	101	97.1	5.9	16.8	22.8	50.5	4.0	6.7	22.6	32.7	35.8	2.3
Limited-Scope													
Savannah MSA	1.1	3	2.9	33.3	33.3	0.0	33.3	0.0	10.1	31.0	33.4	22.7	2.8
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 29 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 11 were within 1,000 feet of moderate-income geographies. In addition, JPMCB branches in the Atlanta CSA included seven Community Branches, of which two were in low-income geographies and three were in moderate-income geographies. The bank also had a Community Center

Branch located in a low-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. JPMCB had 276 deposit-taking ATMs in the AA, of which 5.8 percent were in low-income geographies and 19.9 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Atlanta CSA	17	3	2	4	2	5	1
Limited-Scope							
Savannah MSA	1	0	0	0	1	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 17 branches, of which two were in low-income geographies and four were in moderate-income geographies. The bank closed three branches, none of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturdays. There were 47 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Atlanta CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 3,378 qualified CD service activities to 109 organizations, for a total of 5,415 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by seven bank employees spending 301 hours participating on boards and committees for six different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy, and homebuyer education.

Service activities during the evaluation period include:

- A JPMCB employee provided 40 hours serving on the board of a nonprofit organization that serves the needs of the low- and moderate-income community. The organization's mission is to address structural barriers to affordable housing and provide more opportunities for homeownership.
- JPMCB partnered with 16 CCAs to provide tailored credit counseling and debt education to 2,597 low- and moderate-income individuals. JPMCB sponsored training covered budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Conclusion for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Savannah MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the Service Test conclusion for the state of Georgia.

State of Idaho

CRA rating for the state of Idaho: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Idaho

Examiners assessed performance in six AAs in the state of Idaho rating area. These were comprised of a portion of the Boise City, ID (Boise City) MSA, Idaho Falls, ID (Idaho Falls) MSA, Pocatello, ID (Pocatello) MSA and Twin Falls, ID (Twin Falls) MSA, the entire Coeur d'Alene, ID (Coeur d'Alene) MSA, and two counties in the non-MSA Idaho AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Idaho is JPMCB's 29th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$1.9 billion in deposits in the state of Idaho, of which approximately \$1.8 billion represent retail branch deposits. As of December 31, 2023, the bank operated 15 branches and 35 deposit taking ATMs in the state, representing 0.3 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$1.7 billion in loans, or 0.3 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 26 banks operating 261 branches in the state rating area. JPMCB ranked fourth in deposit market share with 6.4 percent. Primary competitors include Wells Fargo Bank with 18.9 percent deposit market share, U.S. Bank with 17 percent, and Bank of America with 9.4 percent.

Boise City MSA

The Boise City MSA AA consists of Ada, Canyon, and Owyhee counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 21 banks operating 148 branches in the AA. JPMCB

operated 11 branches and ranked third in deposit market share with 8.4 percent. Primary competitors in the AA include Wells Fargo Bank and U.S. Bank, each with 23 percent deposit market share, and First Interstate Bank with 6.3 percent. As of December 31, 2023, the bank operated 22 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Boise City MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Boise City MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	91	6.6	30.8	36.3	26.4	0.0
Population by Geography	627,786	3.5	27.8	44.0	24.7	0.0
Housing Units by Geography	240,483	4.1	28.1	42.9	24.8	0.0
Owner-Occupied Units by Geography	153,696	1.5	23.5	45.6	29.4	0.0
Occupied Rental Units by Geography	73,326	8.7	36.7	38.7	15.9	0.0
Vacant Units by Geography	13,461	8.9	34.2	35.2	21.7	0.0
Businesses by Geography	95,594	8.1	22.4	39.1	30.5	0.0
Farms by Geography	3,478	3.9	26.6	44.0	25.5	0.0
Family Distribution by Income Level	154,904	19.2	18.7	21.7	40.4	0.0
Household Distribution by Income Level	227,022	22.8	16.6	18.9	41.7	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$61,722	Median Housing Value			\$173,923
			Median Gross Rent			\$839
			Families Below Poverty Level			10.2%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Boise City MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	186	2.2	18.8	47.8	30.6	0.5
Population by Geography	737,985	2.2	18.9	48.6	30.0	0.3
Housing Units by Geography	270,395	2.1	19.6	48.5	29.5	0.4
Owner-Occupied Units by Geography	183,738	0.6	15.9	50.7	32.7	0.0
Occupied Rental Units by Geography	75,893	5.3	27.8	43.8	21.9	1.2
Vacant Units by Geography	10,764	3.9	24.8	43.2	27.7	0.4
Businesses by Geography	124,742	1.6	16.9	46.4	35.0	0.1

Table A – Demographic Information of the Assessment Area Assessment Area: Boise City MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	4,460	0.8	19.9	46.3	32.9	0.0
Family Distribution by Income Level	173,393	17.1	19.1	22.9	40.9	0.0
Household Distribution by Income Level	259,631	21.2	17.0	21.1	40.7	0.0
Median Family Income MSA - 14260 Boise City, ID MSA		\$77,090	Median Housing Value			\$277,803
			Median Gross Rent			\$993
			Families Below Poverty Level			6.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Boise City MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Boise City MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Boise City MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$772 according to 2015 ACS data and \$964 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,234 according to 2015 ACS data and \$1,542 according to 2020 Census data. The monthly mortgage payment for the median home in the Boise City MSA would be \$934 using 2015 ACS data and \$1,491 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 51.4 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Boise City MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Boise City MSA, 10.2 percent of families had incomes below the FPL according to the 2015 ACS and 6.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Boise City MSA was 3 percent compared to the Idaho state unemployment rate of 3.1 percent and the national unemployment rate of 3.5 percent.

Economic Data

Boise City's economy had stellar performer. Nonfarm payroll growth accelerated ahead of the state average and more than doubled the national pace. Boise City accounted for nearly half of the state's labor market but contributed almost three-quarters of net job additions since third quarter 2023, driven by the education/healthcare and professional/business services industries. The unemployment rate approached the two-year high, due in part to an expanding labor force. House price appreciation reemerged after a period of weakness in recent quarters. Single-family permitting increased in 2023, but this was only enough to bring levels in line with the five-year average. The area's strengths included above-average population growth, cheaper living costs than in other large west coast metro areas, and below-average business costs. Weaknesses included above-average volatility tied to cyclical semiconductor industry and a lack of high-wage jobs outside of technology and manufacturing.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations serving the area. These organizations focus on small business, economic, development and affordable housing. Contacts noted that the area weathered the COVID-19 pandemic well, with relatively low levels of unemployment. The area did not experience a lot of government mandated shutdowns as experienced in other parts of the country, however, there were stipulations placed on those working in the restaurant and hospitality industries. The area did see a huge surge of tourism during the pandemic, due to people seeking outdoor recreational opportunities. The area has experienced some labor supply issues, particularly among small businesses who are challenged to attract workers. Contacts also noted that housing costs are increasing which is forcing people out to more remote areas to access housing that is more affordable. Other needs identified within the community include:

- Funding to support the development of affordable housing
- Small business technical assistance and financial education
- Enhanced outreach for small businesses to increase awareness of available funding and technical resources

Scope of Evaluation in State of Idaho

Examiners selected the Boise City MSA for full-scope review, as it represented the largest concentration of deposits, lending and branches in the state of Idaho. The MSA accounts for 74 percent of the bank's adjusted deposits and 67.2 percent of lending in the state. The Coeur d'Alene, Idaho Falls, Pocatello, and Twin Falls MSAs and non-MSA Idaho AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Coeur D'Alene and Idaho Falls MSAs and non-MSA Idaho AA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for those AAs.

JPMCB did not originate a sufficient volume of small loans to farms in the Pocatello MSA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

There were no low-income geographies in the Coeur D’Alene, Idaho Falls, and Twin Falls MSAs or the non-MSA Idaho AA. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Boise City MSA was excellent.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Boise City MSA	2,566	11,710	298	2	14,699	67.3	74.2
Limited-Scope							
Coeur d'Alene MSA	683	2,366	43	24	3,116	14.3	9.1
Idaho Falls MSA	269	1,459	42	4	1,774	8.1	8.4
Pocatello MSA	102	598	20	0	720	3.3	0.0
Twin Falls MSA	126	648	75	7	856	3.9	2.6
Non-MSA ID	80	556	41	7	684	3.1	5.8
Broader Statewide/Regional Area							
Indirect Benefit				2	2	0.0	
Total	3,826	17,337	519	46	21,851	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Boise City MSA	884,754	157,032	3,020	45,467	1,090,273	65.4	74.2
Limited-Scope							
Coeur d'Alene MSA	296,126	27,966	338	0	324,430	19.5	9.1
Idaho Falls MSA	70,127	20,519	504	30,327	121,477	7.3	8.4
Pocatello MSA	27,450	7,021	248	0	34,719	2.1	N/A
Twin Falls MSA	34,299	7,510	845	0	42,654	2.6	2.6
Non-MSA ID	19,624	7,600	503	11,000	38,727	2.3	5.8

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Broader Statewide/Regional Area							
Indirect Benefit				14,592	14,592	0.9	
Total	1,332,380	227,648	5,458	101,386	1,666,872	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 8.4 percent. The bank ranked third among 21 depository financial institutions placing it in the top 15 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 25th among 420 home mortgage lenders in the AA, which placed it in the top 6 percent of lenders. The top three lenders were Idaho Central Credit Union (22.6 percent), Fairway Independent Mortgage Corp (4.2 percent), and Rocket Mortgage (3.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 95 small business lenders in the AA. The other top lenders were American Express (18.5 percent), U.S. Bank (11.2 percent), and Capital One (9.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 19.7 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 21 small farm lenders in the AA, which placed it in the top 10 percent of lenders. The other top lenders were U.S. Bank (20.2 percent), Columbia State Bank (10.2 percent), and John Deere Financial (10.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the

performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in both low and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in low-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies but was equal to the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in those geographies but was below the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was near to the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due a lower distribution of small loans to farms with gross annual revenues of \$1 million or less.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$45.5 million, which represented 33.1 percent of the allocated tier 1 capital. By dollar volume, 99.9 percent of these loans funded affordable housing and 0.1 percent funded revitalization and stabilization efforts. The loan was used to retain workers, maintain payroll, pay mortgage/lease, and pay utilities. Of the CD loans, one was a PPP loan totaling \$39,785 to provide relief for an organization due to the COVID-19 pandemic.

CD loans made during the evaluation period included a \$45.4 million tax exempt bond loan to fund the new construction of an affordable rental development for low- and moderate-income families. The property will consist of 264 units, with 262 of the units targeting households earning 30 to 70 percent of AMI.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 592 loans in the amount of \$55.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	47	8,599
Federal Housing Administration (FHA)	7	1,757
Chase Homebuyer Grant Loans	39	11,951
Homebuyer Education Grants	10	5
Veteran's Administration (VA)	5	2,021
VA Purchase Closing Credit	2	1,193
Paycheck Protection Program (PPP)	482	29,763
Total	592	55,289

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Idaho.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$14.6 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans supported affordable housing efforts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Idaho Fall MSA and non-MSA Idaho AA was consistent with the bank's performance in the full-scope area. Performance in the Coeur d'Alene MSA, Pocatello MSA, and Twin Falls MSA was weaker than the bank's performance in the full-scope area due to lower levels of CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion for State of Idaho.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall Investment Test conclusion and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 25.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made seven grants and donations totaling \$134,000 to six organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Boise City MSA	1	148	18	35,076	19	55.9	35,223	60.2	0	0
Limited-Scope										
Coeur d'Alene MSA	2	1,027	3	13,869	5	14.7	14,896	25.5	0	0
Idaho Falls MSA	0	0	1	387	1	2.9	387	0.7	0	0
Pocatello MSA	0	0	2	663	2	5.9	663	1.1	0	0
Twin Falls MSA	0	0	1	234	1	2.9	234	0.4	0	0
Non-MSA ID	0	0	1	6,435	1	2.9	6,435	11.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	3	259	3	8.8	259	0.4	0	0
Indirect Benefit	1	375	1	50	2	5.9	425	0.7	0	0
Total	4	1,550	30	56,971	34	100.0	58,521	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.7 percent of investments supported affordable housing and 0.3 percent funded community services to low- and moderate-income individuals.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$31.2 million that supported 124 affordable units.

Qualified investments made during the evaluation period include:

- A \$31.2 million LIHTC equity investment for the construction of an affordable apartment complex. The complex will consist of 193 units, with 124 units reserved for families earning 60 percent or less of AMI. The property will also contain approximately 2,400 square feet of commercial space.
- A \$50,000 grant to the local chapter of a nationwide community service organization. The grant was to support a program that focused on employed residents with limited assets and constrained incomes, with 100 percent of participants earning less than 50 percent of the AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Coeur d'Alene MSA and the non-MSA Idaho AAs was consistent with the bank's performance in the full-scope area. The bank's performance in the Idaho Falls MSA, Pocatello MSA, and Twin Falls MSA was weaker than the bank's performance in the full-scope area due to lower levels of investments. Performance in the limited-scope areas had a neutral impact on the overall Investment test conclusion for the state of Idaho.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Idaho. The bank made three investments totaling \$259,000 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$425,000 of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included a grant supporting community services and a LIHTC that supported 45 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of Idaho is rated High Satisfactory. Performance in the limited-scope AAs had a negative impact on the Service Test conclusion for the state of Idaho.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Boise City MSA	74.2	10	66.7	0.0	30.0	30.0	40.0	0.0	2.2	18.9	48.6	30.0	0.3
Limited-Scope													
Coeur d’Alene MSA	9.1	1	6.7	0.0	100.0	0.0	0.0	0.0	0.0	16.1	63.1	20.8	0.0
Idaho Falls MSA	8.4	1	6.7	0.0	0.0	100.0	0.0	0.0	0.0	22.8	50.0	27.2	0.0
Pocatello MSA	0.0	0	0	0.0	0.0	0.0	0.0	0.0	3.0	26.0	55.0	15.9	0.0
Twin Falls MSA	2.6	1	6.7	0.0	0.0	100.0	0.0	0.0	0.0	13.7	72.6	13.7	0.0
Non-MSA ID	5.8	2	13.3	0.0	0.0	50.0	50.0	0.0	0.0	8.8	62.5	28.7	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered four branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which three were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 22 deposit-taking ATMs in the AA, of which none were in low-income geographies and 27.3 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Boise City MSA	0	3	-1	-1	0	-1	0
Limited-Scope							
Coeur d’Alene MSA	0	0	0	0	0	0	0
Idaho Falls MSA	0	1	0	-1	0	0	0
Pocatello MSA	0	1	0	0	-1	0	0
Twin Falls MSA	0	0	0	0	0	0	0
Non-MSA ID	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 did not open any branches during the evaluation period. The bank closed three branches, of which one was in a low-income geography, and one was in a moderate-income geography. The branch closures were the result of the bank's decision to exit in-store locations.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. or 10:00 a.m. to 1:00 p.m. on Saturdays. There were five locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Boise City MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 242 qualified CD service activities to 14 organizations, for a total of 310 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with homebuyer education, tutoring, and credit counseling.

Service activities during the evaluation period include:

- JPMCB partnered with CCAs financial literacy and workforce development trainings that impacted 45 low- and moderate-income youth and adults. The training provided financial coaching that included knowledge and skills needed to obtain long-term financial stability such as budgeting, credit, savings, and investing.

- One bank employee provided 18 hours of homebuyer workshops and seminars that impacted 52 low- and moderate-income homebuyers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Coeur d'Alene MSA was consistent with the bank's performance in the full-scope area. Performance under the Service Test in the Idaho Falls MSA, Pocatello MSA, Twin Falls MSA, and non-MSA Idaho was weaker than the bank's performance in the full scope area due to a lower percentage of branch distribution in moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies.

State of Illinois

CRA rating for the state of Illinois¹⁷: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made an adequate level of CD loans.
- An overall poor level of qualified investments, grants, and donations that demonstrated good responsiveness to meet the credit and CD needs in the bank's AAs. Performance in the limited-scope AA positively impacted the overall Investment Test conclusion.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Illinois

Examiners assessed performance in six AAs in the state of Illinois rating area. These were comprised of the entire Rockford, IL (Rockford) MSA, Bloomington, IL (Bloomington) MSA, Champaign-Urbana, IL (Champaign) MSA, and Springfield, IL (Springfield) MSA and a portion of the Davenport-Moline-Rock Island, IA- IL (Davenport) and Peoria, IL (Peoria) MSAs. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Illinois is JPMCB's 23rd largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$4.1 billion in deposits in the state of Illinois rating area, of which approximately \$3.9 billion represent retail branch deposits. As of December 31, 2023, the bank operated 15 branches and 40 deposit taking ATMs in the state, representing 0.3 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$819.8 million in loans, or 0.1 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 100 banks operating 427 branches in the state rating area. JPMCB ranked second in deposit market share with 9.9 percent. Primary competitors include Busey Bank with 10.3 percent deposit market share, PNC Bank with 8.9 percent, and Morton Community Bank with 8.8 percent.

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.

Rockford MSA

The Rockford MSA AA consists of Boone and Winnebago counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 71 branches in the AA. JPMCB operated five branches and was ranked third in deposit market share with 11.8 percent. Primary competitors in the AA include HTLF Bank with 18.1 percent deposit market share, Midland States Bank with 14.1 percent, and Associated Bank, N.A. with 8.6 percent. As of December 31, 2023, the bank operated 15 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Rockford MSA AA for each analysis periods.

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	84	15.5	22.6	29.8	29.8	2.4
Population by Geography	344,290	10.8	19.6	31.3	38.1	0.3
Housing Units by Geography	145,688	11.4	20.0	30.8	37.2	0.6
Owner-Occupied Units by Geography	90,213	5.1	15.9	33.5	45.4	0.0
Occupied Rental Units by Geography	41,828	21.3	27.8	26.0	23.3	1.6
Vacant Units by Geography	13,647	22.2	23.2	27.0	26.0	1.6
Businesses by Geography	20,891	9.2	15.8	28.6	44.1	2.3
Farms by Geography	798	4.4	12.3	31.8	50.8	0.8
Family Distribution by Income Level	88,592	21.9	17.0	20.4	40.7	0.0
Household Distribution by Income Level	132,041	24.8	15.6	18.2	41.4	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$116,330
			Median Gross Rent			\$756
			Families Below Poverty Level			12.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	90	8.9	30.0	28.9	28.9	3.3
Population by Geography	338,798	5.7	26.1	33.4	33.6	1.1
Housing Units by Geography	145,782	6.8	27.3	32.7	31.8	1.4
Owner-Occupied Units by Geography	91,376	3.1	21.3	34.5	40.9	0.3

Table A – Demographic Information of the Assessment Area Assessment Area: Rockford MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	43,191	12.7	37.8	30.9	15.2	3.4
Vacant Units by Geography	11,215	14.3	36.2	24.5	21.5	3.6
Businesses by Geography	26,507	4.8	24.5	30.9	36.8	3.0
Farms by Geography	976	3.4	16.8	20.9	58.1	0.8
Family Distribution by Income Level	87,825	21.8	17.2	19.5	41.5	0.0
Household Distribution by Income Level	134,567	24.1	16.3	17.6	42.0	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$69,881	Median Housing Value			\$121,421
			Median Gross Rent			\$827
			Families Below Poverty Level			10.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Rockford MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Rockford MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Rockford MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$751 according to 2015 ACS data and \$874 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,201 according to 2015 ACS data and \$1,398 according to 2020 Census data. The monthly mortgage payment for the median home in the Rockford MSA would be \$624 using 2015 ACS data and \$652 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 50 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Boise City MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Rockford MSA, 12.3 percent of families had incomes below the FPL according to the 2015 ACS and 10.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Rockford MSA was 5.9 percent compared to the Illinois state unemployment rate of 4.2 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Rockford area experienced net job loss during the evaluation period. Manufacturing employment depressed due to declining demand for products from a top employer. Jobs in logistics, storage, and cargo provided stability but did not make up for losses in manufacturing. Total employment increased for two straight months after bottoming out in July 2023. Services are carrying the day, particularly healthcare and retail trade, while goods producers are no longer hemorrhaging jobs. The unemployment rate jumped to more than 7 percent in July 2023, with the increase attributed to an increase in the labor force. New entrants joined the labor market to take advantage of higher pay. The area continued to grapple with a declining population. The population declined since 2010, with the biggest losses observed among the prime working-age group. Over the past decade, this population cohort experienced one of the largest declines in the nation, which poses difficulties in attracting new high-value investments and growing high-wage industries. The scarcity of job opportunities perpetuates a cycle of outmigration among working-age residents, hurting population-dependent industries and reducing the tax base. The area's strengths included low business costs and its proximity to Chicago, while weaknesses included weak demographic trends, high rates of crime and poverty, low per capita income, and a low concentration of prime-age workers.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations that serve the area. These organizations focus on affordable housing and economic development. Contacts noted that the Rockford area has a sizable population of adults over age 65 and approximately half of the area's residents are low or moderate-income. About 70 percent of the housing stock was built prior to 1979, and the presence of lead-based paints adds to the area's housing concerns. Many homes need repairs and do not meet health and safety requirements. Low- and moderate-income individuals do not have sufficient savings to make the necessary repairs or improvements. The farm economy has declined recently due to high interest rates, falling commodity prices, and the lack of availability of new equipment. Identified needs in the community include:

- Direct term loans and operating lines of credit for small businesses
- Increased access to agricultural lending
- Home Improvement funding programs for low- and moderate-income homeowners
- Assistance for homeowners whose home values are underwater

Scope of Evaluation in State of Illinois

Examiners selected the Rockford MSA for full-scope review, as it represented a material concentration of deposits, lending, and branches in the state of Illinois and had not recently received a full-scope review. The MSA accounts for 23.3 percent of the bank's adjusted deposits and 28.3 percent of lending in the state. The Bloomington, Champaign, Davenport, Peoria, and Springfield MSAs received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Rockford or Bloomington MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusions for small loans to farms are based solely on performance during the 2022 through 2023 analysis period for those AAs.

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. Performance in the limited-scope AAs lowered the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Rockford MSA	943	3,382	65	3	4,393	28.3	23.2
Limited-Scope							
Bloomington MSA	605	1,432	68	1	2,106	13.6	10.9
Champaign MSA	565	2,202	83	2	2,852	18.4	26.9
Davenport MSA	128	987	62	3	1,180	7.6	3.7
Peoria MSA	522	2,119	94	0	2,735	17.6	12.6
Springfield MSA	256	1,922	70	1	2,249	14.5	22.8
Broader Statewide/Regional Area							
Direct Benefit				2	2	0.0	
Indirect Benefit				9	9	0.1	
Total	3,019	12,044	442	21	15,526	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Rockford MSA	133,252	60,872	570	6,571	201,265	24.7	23.2
Limited-Scope							
Bloomington MSA	124,804	21,223	707	5	146,739	18.0	10.9
Champaign MSA	111,718	29,598	856	8,041	150,213	18.4	26.9
Davenport MSA	17,722	13,404	555	11,878	43,559	5.3	3.7

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Peoria MSA	91,068	33,635	898	0	125,601	15.4	12.6
Springfield MSA	42,089	26,597	854	191	69,731	8.5	22.8
Broader Statewide/Regional Area							
Direct Benefit				34,286	34,286	3.7	
Indirect Benefit				48,504	48,504	5.9	
Total	520,653	185,329	4,440	109,476	819,898	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 11.8 percent. The bank ranked third among 22 depository financial institutions placing it in the top 14 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 13th among 316 home mortgage lenders in the AA, which placed it in the top 5 percent of lenders. The top three lenders were Blackhawk Bank (10.4 percent), Envoy Mortgage (6.7 percent), and Midland States Bank (5.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 19.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 73 small business lenders in the AA. The other top lenders were American Express (15.4 percent), U.S. Bank (11.1 percent), and Capital One (9.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 16.7 percent based on the number of small loans to farms originated or purchased. The bank ranked third among 17 small farm lenders in the AA, which placed it in the top 18 percent of lenders. The other top lenders were Midland States Bank (36.4 percent), John Deere Financial (17.3 percent), and U.S. Bank (8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate level of 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through due to lower distributions of lending in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank made no small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made three CD loans totaling \$6.6 million, which represented 6.9 percent of the allocated tier 1 capital. All three loans were PPP loans that supported revitalization and stabilization efforts. These loans provided relief for organizations due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 551 loans in the amount of \$65.2 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	72	7,497
Federal Housing Administration (FHA)	29	5,034
Chase Homebuyer Grant Loans	53	5,957
Homebuyer Education Grants	46	23
Home Lending SPCP	6	414
Community Lending Program (Correspondent SPCP)	4	395
Veteran's Administration (VA)	5	816
VA Purchase Closing Credit	3	504
Business Card SPCP	2	8
Business Banking SPCP	2	140
Paycheck Protection Program (PPP)	329	44,393
Total	551	65,181

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Illinois.

The bank made two CD loans totaling \$34.3 million to a borrower in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan supported affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered nine CD loans totaling \$48.5 million in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Champaign MSA and Davenport MSA was consistent with the bank's performance in the full-scope area. Performance in the Bloomington MSA, Springfield MSA, and Peoria MSA was weaker than the bank's performance in the full-scope area due to lower geographic distributions of loans and lower levels of CD lending activities. Performance in the limited-scope AAs lowered the overall Lending Test conclusion.

Refer to Tables O through T in 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. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a positive impact, raising the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rockford MSA was poor.

Number and Amount of Qualified Investments

The bank had a poor level of qualified CD investment and grants, not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 2.6 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants and donations, totaling \$4,760 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Rockford MSA	2	2,058	3	403	5	7.8	2,461	1.3	0	0
Limited-Scope										
Bloomington MSA	1	1,942	2	24,364	3	4.7	26,306	14.2	0	0
Champaign MSA	1	245	9	1,415	10	15.6	1,661	0.9	0	0
Davenport MSA	2	8,537	3	20,503	5	7.8	29,040	15.7	0	0
Peoria MSA	2	4,774	2	24,787	4	6.3	29,561	16.0	0	0
Springfield MSA	3	1,541	2	18,697	5	7.8	20,238	10.9	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Statewide/Regional Area										
Direct Benefit	0	0	5	850	5	7.8	850	0.5	0	0
Indirect Benefit	21	16,958	6	58,211	27	42.2	75,169	40.6	0	0
Total	32	36,054	32	149,231	64	100.0	185,284	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited good responsiveness to credit and community economic development needs. Investments were responsive to identified CD needs for affordable housing. By dollar volume, 99.8 percent of investments supported affordable housing and 0.2 percent funded community services to low- and moderate-income individuals.

The bank did not use innovative and/or complex investments to support CD initiatives during this evaluation period. Qualified investments made during the evaluation period include:

- A \$398,309 mortgage-backed security where the proceeds were used to finance two affordable single-family homes located in the bank's AA. The properties were affordable at 50 percent and 74 percent of AMI.
- A \$2,000 grant to a nonprofit, affordable housing organization. The funding supported the organization's financial empowerment workshop series targeted for low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Champaign MSA was consistent with the bank's performance in the full-scope AA. Performance in the Bloomington MSA, Davenport MSA, Peoria MSA, and Springfield MSA was stronger than the bank's performance in the full-scope AA due to higher levels of investment activity in these AAs. Stronger performance in the limited-scope areas had raised the overall Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas positively impacted the overall Investment Test rating for the state of Illinois. The bank made five current-period investments totaling \$850,138 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because JPMCB was responsive to CD needs and opportunities in its AAs, examiners considered \$75.2 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve

those AAs. These investments included LIHTC investments that supported 1,401 affordable units, NMTCs, and an MBS investment.

SERVICE TEST

The bank's performance under the Service Test in the state of Illinois is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Illinois.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Rockford MSA	23.2	5	33.3	0.0	40.0	40.0	20.0	0.0	5.7	26.1	33.4	33.6	1.1
Limited-Scope													
Bloomington MSA	10.9	1	6.7	0.0	0.0	100.0	0.0	0.0	1.3	23.3	47.5	19.8	8.1
Champaign MSA	26.9	4	26.7	0.0	25.0	25.0	25.0	25.0	12.6	19.8	26.6	34.3	6.7
Davenport MSA	3.7	1	6.7	100.0	0.0	0.0	0.0	0.0	4.7	24.7	58.1	12.5	0.0
Peoria MSA	12.6	2	13.3	50.0	0.0	50.0	0.0	0.0	6.1	19.5	50.7	23.7	0.0
Springfield MSA	22.8	2	13.3	50.0	0.0	0.0	50.0	0.0	12.3	19.5	33.1	35.0	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

JPMCB had several ADS, including ATMs, online banking, and mobile banking options. The bank had 15 deposit-taking ATMs in the AA, none of which were in low-income geographies and 46.7 percent

were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services to both retail and business customers and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Rockford MSA	0	0	0	0	0	0	0
Limited-Scope							
Bloomington MSA	0	1	0	-1	0	0	0
Champaign MSA	1	0	0	1	0	0	0
Davenport MSA	0	1	0	0	-1	0	0
Peoria MSA	0	1	0	0	-1	0	0
Springfield MSA	0	1	-1	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

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

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays. All five branch locations had drive-thru facilities operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Rockford MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total 282 qualified CD service activities to 17 organizations, for a total of 360 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and homebuyer education.

Service activities during the evaluation period include:

- The bank partnered with 16 nonprofit CCAs to provide credit counseling and debt education to 204 low- and moderate-income individuals. The topics covered included budget counseling, debt management, foreclosure prevention, student loan counseling, and bankruptcy counseling.

- The bank provided pre-purchase homebuyer education trainings, totaling 118 hours, to 46 low- and moderate-income individuals. The homebuyer education trainings were offered as a voluntary option during the homebuying process.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Champaign MSA, Davenport MSA, Peoria MSA, and Springfield MSA was consistent with the bank's performance in the full-scope AA. Performance in the Bloomington MSA was weaker than the bank's performance in the full-scope AA due to no branches located in low- and moderate-income geographies.

State of Indiana

CRA rating for the state of Indiana¹⁸: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made a relatively high level of CD loans.
- An overall significant level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs. Weaker performance in the limited-scope AAs was offset by investments in the broader statewide or regional area.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Indiana

Examiners assessed performance in seven AAs in the state of Indiana rating area. These were comprised of a majority of the Indianapolis-Carmel-Muncie, IN (Indianapolis) CSA, the entire Bloomington-Bedford, IN (Bloomington) CSA, the entire Elkhart-Goshen, IN (Elkhart) MSA, a portion of the Fort Wayne-Huntington-Auburn, IN (Fort Wayne) CSA, portions of the Lafayette-West Lafayette, IN (Lafayette) MSA, and South Bend-Mishawaka, IN-MI (South Bend) MSA, and one county in the non-MSA Indiana AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Indiana is JPMCB's 13th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$22.4 billion in deposits in the state of Indiana rating area, of which approximately \$20.8 billion represent retail branch deposits, representing 1.5 percent of total bank deposits. As of December 31, 2023, the bank operated 91 branches and 215 deposit taking ATMs in the rating area, representing 1.9 percent of total branches and 1.4 percent of total ATMs. The bank originated and purchased approximately 4.9 billion in loans, or 0.7 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 73 banks operating 836 branches in the state rating area. JPMCB ranked first in deposit market share with 18.6 percent. Primary

¹⁸ 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.

competitors include PNC Bank with 11.4 percent deposit market share, Merchants Bank of Indiana with 10.5 percent, and Fifth Third Bank with 6.8 percent.

Indianapolis CSA

The Indianapolis CSA AA consists of Boone, Delaware, Hamilton, Hancock, Hendricks, Henry, Johnson, Madison, Marion, Montgomery, Morgan, and Shelby counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 47 banks operating 513 branches in the AA. JPMCB operated 60 branches and ranked first in deposit market share with 18 percent. Primary competitors in the AA include PNC Bank with 13.5 percent deposit market share, Merchants Bank of Indiana with 12.7 percent, and Fifth Third Bank with 7.8 percent. As of December 31, 2023, the bank operated 152 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Indianapolis CSA AA for each period.

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	438	16.2	26.9	33.6	22.4	0.9
Population by Geography	2,102,666	10.4	22.4	34.2	32.3	0.7
Housing Units by Geography	897,807	12.0	24.6	33.4	29.7	0.3
Owner-Occupied Units by Geography	521,918	6.0	17.3	38.3	38.4	0.1
Occupied Rental Units by Geography	279,563	18.7	35.5	27.0	18.2	0.7
Vacant Units by Geography	96,326	25.3	32.3	25.5	16.3	0.6
Businesses by Geography	240,290	10.7	20.5	31.5	37.0	0.3
Farms by Geography	7,298	5.5	12.8	48.2	33.3	0.1
Family Distribution by Income Level	519,103	21.9	17.3	19.8	41.1	0.0
Household Distribution by Income Level	801,481	23.8	16.3	17.8	42.1	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$138,354
Median Family Income MSA - 34620 Muncie, IN MSA		\$51,935	Median Gross Rent			\$814
Median Family Income Non-MSAs - IN		\$55,715	Families Below Poverty Level			10.9%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Indianapolis CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	517	11.8	24.6	37.1	24.4	2.1
Population by Geography	2,257,592	8.0	20.9	39.4	30.1	1.6
Housing Units by Geography	934,740	9.4	22.3	39.3	27.6	1.4
Owner-Occupied Units by Geography	558,762	4.6	16.2	43.2	35.1	0.9
Occupied Rental Units by Geography	291,902	15.5	31.6	33.8	17.0	2.2
Vacant Units by Geography	84,076	20.1	30.9	32.4	14.8	1.8
Businesses by Geography	332,271	8.2	19.6	36.0	33.2	3.0
Farms by Geography	9,585	5.0	14.4	49.1	30.4	1.0
Family Distribution by Income Level	539,302	20.6	17.8	21.0	40.6	0.0
Household Distribution by Income Level	850,664	23.4	16.4	18.4	41.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$80,981	Median Housing Value			\$171,456
Median Family Income MSA - 34620 Muncie, IN MSA		\$61,415	Median Gross Rent			\$935
Median Family Income Non-MSAs - IN		\$67,032	Families Below Poverty Level			8.2%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Indianapolis CSA - Missing 2015 by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Indianapolis CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Indianapolis CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$649 to \$835 according to 2015 ACS data and from \$768 to \$1,012 according to 2020 Census data, depending on where in the CSA they reside. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,039 to \$1,336 according to 2015 ACS data and \$1,228 to \$1,620 according to 2020 Census data, depending on where in the CSA they reside. The monthly mortgage payment for the median home in the Indianapolis CSA would be \$743 using 2015 ACS data and \$920 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 50.8 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Indianapolis CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Indianapolis CSA, 10.9 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Indianapolis CSA was 2.5 percent compared to the Indiana state unemployment rate of 2.8 percent and the national unemployment rate of 3.5 percent.

Economic Data

Employment growth in the Indianapolis area outpaced that of the state and the nation. Gains have been broad-based with manufacturing, finance and professional services all posting steady gains. Logistics was finding its footing after a brief stumble. The area's central location, in the heart of the Midwest and at the intersection of several interstate highways, made it an ideal logistics hub, especially when paired with low business costs. As is the case nationally, the unemployment rate was edging higher, but this is partly because of labor force gains. Although the proportion of jobs in manufacturing is only slightly higher than nationally, the high wages of the jobs heighten their importance by supporting downstream industries. Wages are about 40 percent higher than the typical job in Indianapolis and 10 percent higher than a normal U.S. factory role, led primarily by pharmaceutical manufacturing. House price appreciation cooled somewhat and trails that of the nation. Housing permits continued at a modest pace, slightly better than the average from the prior business cycle. Population growth outpaced that in the state and nation for years. The area attracted new residents from larger metro areas due to its low living cost and strong job market, but also consistently draws residents from less populous areas of the state in search of better opportunities. The area's strengths included a diversified industrial structure and well-developed distribution network, a growing pharmaceutical industry, high birthrate and strong migration trends and low business and living costs. Weaknesses included exposure to public sector weaknesses and above-average employment volatility.

Community Contacts

Examiners reviewed six community contacts completed during the evaluation period with organizations that serve the area. These organizations focus on affordable housing, economic development, small business, and neighborhood revitalization. Contacts noted that inflation has caused significant problems. Small business lending is more restricted, and lenders seem more risk averse. Many small businesses and entrepreneurs struggle to access financing, particularly start-up financing. There is not a large CDFI presence in the area so the few entities that do work to assist small businesses see a high demand for services, particularly for technical assistance. Housing inventory is low, and prices are high. Corporate buyers are pushing up housing prices and outbidding individuals and families looking to purchase a home. Community needs identified include:

- Affordable multi-family rental housing
- Grant funding for nonprofit organizations
- Financial assistance and technical assistance for small businesses
- More banker involvement with board service for small nonprofit organizations

- Increase bank involvement in State Small Business Credit Initiative (SSBCI)

Scope of Evaluation in State of Indiana

Examiners selected the Indianapolis CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Indiana. The CSA accounts for 71 percent of the bank's adjusted deposits and 71.1 percent of lending in the state. The Bloomington, Elkhart, Fort Wayne, Lafayette, and South Bend MSAs and the non-MSA Indiana AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Bloomington, Elkhart, and South Bend MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusions for small loans to farms are based solely on performance during the 2022 through 2023 analysis period for those AAs.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Indiana AA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

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. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Indianapolis CSA	12,827	37,246	518	74	50,665	71.1	72.3
Limited-Scope							
Bloomington CSA	651	2,307	48	8	3,014	4.2	5.0
Elkhart MSA	723	2,117	59	4	2,903	4.1	6.0
Fort Wayne CSA	2,174	5,734	111	11	8,030	11.3	8.5
Lafayette MSA	708	1,941	93	3	2,745	3.9	5.6
South Bend MSA	956	2,324	27	2	3,309	4.6	1.8
Non-MSA IN	124	409	28	1	562	0.8	0.8

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Broader Statewide/Regional Area							
Indirect Benefit				3	3	0.0	
Total	18,163	52,078	884	106	71,231	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Indianapolis CSA	2,863,092	679,545	5,941	71,614	3,620,192	73.3	72.3
Limited-Scope							
Bloomington CSA	133,324	38,963	459	33,585	206,331	4.2	5.0
Elkhart MSA	124,294	51,982	860	78	177,214	3.6	6.0
Fort Wayne CSA	371,942	121,121	1,524	17,476	512,063	10.4	8.5
Lafayette MSA	133,614	29,224	1,648	3,565	168,051	3.4	5.6
South Bend MSA	179,072	38,655	290	2,160	220,177	4.5	1.8
Non-MSA IN	14,543	4,920	293	1,374	21,130	0.4	0.8
Broader Statewide/Regional Area							
Indirect Benefit				5,875	5,875	0.1	
Total	3,819,881	964,410	11,015	135,727	4,931,033	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 18 percent. The bank ranked first among 47 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked 15th among 647 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Rocket Mortgage (4.7 percent), Caliber Home Loans (4.3 percent), and The Huntington National Bank (4.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 24.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 156 small business lenders in the AA. The other top lenders were American Express (20.3 percent), Capital One (8 percent), and Synchrony Bank (5.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 20.6 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 37 small farm lenders in the AA, which placed it in the top 6 percent of lenders. The other top lenders were John Deere Financial (23 percent), First Farmers Bank & Trust (13.3 percent), and U.S. Bank (7.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was equal to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of

loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies but exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Indiana 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank made a relatively high level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 74 CD loans totaling \$71.6 million, which represented 4.7 percent of the allocated tier 1 capital. By dollar volume, 41 percent of these loans funded affordable housing, 0.01 percent funded economic development, 55.7 percent funded revitalization and stabilization efforts, and 3.2 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 69 PPP loans totaling \$39.6 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$10.4 million construction loan to support the construction of a 60-unit affordable housing unit for seniors. All units were restricted to households with incomes between 30 and 50 percent of the AMI.
- A \$1.2 million line of credit to school district to fund the purchase of student laptops. According to the National Center for Education Statistics, 63 percent of the student population is eligible for the Federal Free or Reduced Lunch program.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 6,233 loans in the amount of \$668.8 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	732	106,000
Federal Housing Administration (FHA)	127	22,493

Loan Type	Number of Loans	Dollar Amount (\$000s)
Chase Homebuyer Grant Loans	343	56,390
Homebuyer Education Grants	356	178
Home Lending SPCP	113	19,909
Community Lending Program (Correspondent SPCP)	30	6,161
Veteran's Administration (VA)	40	10,352
VA Purchase Closing Credit	17	4,902
Business Card SPCP	43	188
Business Banking SPCP	27	2,643
Paycheck Protection Program (PPP)	4,405	439,618
Total	6,233	668,834

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Indiana.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$5.9 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans were PPP loans that supported revitalization and stabilization efforts in response to the COVID-19 pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Elkhart MSA, Lafayette MSA, and South Bend MSA was consistent with the bank's performance in the full-scope area. Performance in the Bloomington CSA was stronger due to better geographic lending performance and higher levels of CD lending activities. Performance in the Fort Wayne CSA and the non-MSA Indiana AA was stronger than the bank's performance due to a higher levels of CD lending activity. Performance in the limited-scope AAs had a neutral impact on the overall rating.

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 High Satisfactory. Performance in the limited-scope AAs had a negative impact on the rating, while investments in the broader statewide or regional areas positively impacted the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of

current- and prior-period investments represented 7.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 39 grants and donations, totaling \$10.3 million to 18 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Indianapolis CSA	28	19,076	51	100,743	79	63.2	119,818	60.9	0	0
Limited-Scope										
Bloomington CSA	5	7,558	3	29,366	8	6.4	36,924	18.8	0	0
Elkhart MSA	0	0	0	0	0	0.0	0	0.0	0	0
Fort Wayne CSA	2	2,781	0	0	2	1.6	2,781	1.4	0	0
Lafayette MSA	1	606	1	210	2	1.6	815	0.4	0	0
South Bend MSA	2	832	0	0	2	1.6	832	0.4	0	0
Non-MSA IN	0	0	0	0	0	0.0	0	0.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	10	667	10	8.0	677	0.3	0	0
Indirect Benefit	18	13,549	4	21,261	22	17.6	34,811	17.7	0	0
Total	56	44,402	69	152,247	125	100.0	196,648	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 88.6 percent of investments supported affordable housing, 6.6 percent funded community services to low- and moderate-income individuals, 3.4 percent supported revitalization and stabilization efforts, and 1.5 percent supported economic development.

The bank made significant use of innovative and complex investments to support CD initiatives. During this evaluation period, the bank made 11 LIHTC investments totaling \$87.3 million that created or maintained 1,549 affordable housing units. Additionally, the bank made one HTC investment totaling \$3.1 million.

Qualified investments made during the evaluation period include:

An \$11.3 million LIHTC investment for the construction of a 62-unit multifamily property in the AA with all units restricted to households earning less than 80 percent of AMI, with 13 units supportive of special needs tenants. The building also included a social service space on the first floor where nonprofit community partners will provide support services to individuals and families.

Five grants totaling \$982,500 to a CDFI in the AA to support programs that provide small business microloans, provide technical assistance for business expansion and increasing revenue, and increase awareness and utilization of technical, social, and capital resources by entrepreneurs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington CSA was stronger than the bank's performance in the full-scope area due to higher levels of qualified investments. Performance under the Investment Test in the Elkhart MSA, Fort Wayne CSA, Lafayette MSA, South Bend MSA, and the non-MSA Indiana AA was weaker than the bank's performance in the full-scope area due to lower levels of qualified investments. Overall performance in limited-scope areas had a negative impact on the overall Investment Test conclusion in the state of Indiana.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas had a positive impact on the Investment Test rating for the state of Indiana. The bank made 10 investments totaling \$667,000 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$34.8 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTC investments that supported 1,159 affordable units and one grant for community services to low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in the state of Indianapolis CSA is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Indiana.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Indianapolis CSA	72.3	60	65.9	10.0	20.0	38.3	30.0	1.7	8.0	20.9	39.4	30.1	1.6
Limited-Scope													

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Bloomington CSA	5.0	5	5.5	20.0	0.0	80.0	0.0	0.0	4.8	16.2	40.9	29.1	9.0
Elkhart MSA	6.0	6	6.6	0.0	50.0	50.0	0.0	0.0	4.2	20.5	49.7	25.6	0.0
Fort Wayne CSA	8.5	12	13.2	0.0	33.3	50.0	16.7	0.0	5.2	19.8	45.6	28.8	0.6
Lafayette MSA	5.6	4	4.4	0.0	50.0	25.0	0.0	25.0	6.2	16.9	40.0	27.4	9.5
South Bend MSA	1.8	2	2.2	0.0	0.0	100.0	0.0	0.0	7.0	23.7	38.2	30.3	0.7
Non-MSA IN	0.8	2	2.2	0.0	0.0	50.0	50.0	0.0	11.8	17.3	57.7	13.2	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners further considered 13 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which eight were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Indianapolis CSA included two Community Branches, of which one was in a low-income geography and one in a moderate-income geography. These branches supported the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 152 deposit-taking ATMs in the AA, of which 10.5 percent were in low-income geographies and 21.7 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services to both retail and business customers and supported the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Indianapolis CSA	3	12	0	-4	-3	-2	0
Limited-Scope							
Bloomington CSA	0	0	0	0	0	0	0
Elkhart MSA	0	1	0	0	0	-1	0
Fort Wayne CSA	0	2	0	0	-2	0	0
Lafayette MSA	0	1	0	-1	0	0	0

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
South Bend MSA	0	0	0	0	0	0	0
Non-MSA IN	0	0	0	0	0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

To the extent changes have been made, the bank's opening and closing of branches generally 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 three branches, of which none were in low- or moderate-income geographies. The bank closed 12 branches, of which none was in low-income geographies and four were in moderate-income geographies. The branch closures were the result of proximity to other branch locations and low transaction volume.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. 5:00 p.m., Monday through Friday, and from 9:00 a.m. to noon, 1:00 p.m. or 2:00 p.m. on Saturdays. There were 47 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Indianapolis CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 1,675 qualified CD service activities to 55 organizations, for a total of 3,362 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 12 bank employees spending over 996 hours participating on boards and committees for 14 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, homebuyer education, and financial capacity training.

Service activities during the evaluation period include:

- JPMCB partnered with a nonprofit organization to provide a series of homebuyer workshops to low- and moderate-income customers. The series focused on the mortgage process, products, and services, available to low- and moderate-income homebuyers.
- JPMCB employee was a founding partner of an organization focused on promoting community development opportunities for low- and moderate-income households and providing instrumental education programs. Throughout the evaluation period, the JPMCB employee has been a member of the board and the operating committee.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Lafayette MSA was consistent with the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Bloomington CSA, Elkhart MSA, Fort Wayne CSA, South Bend MSA and non-MSA Indiana AA was weaker than the bank's performance in the full-scope area due to lower percentages of branch distribution in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies.

State of Iowa

CRA rating for the state of Iowa¹⁹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made few, if any, CD loans, which had a negative effect on the Lending Test rating.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Iowa

Examiners assessed performance in two AAs in the state of Iowa rating area. These were comprised of portions of the Des Moines-West Des Moines, IA (Des Moines) MSA and the Cedar Rapids-Iowa City, IA (Cedar Rapids) CSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Iowa is JPMCB's 47th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$127.2 million in deposits in the state of Iowa rating area, of which approximately \$124.6 million represent retail branch deposits, representing less than 0.1 percent of the bank's total deposits. As of December 31, 2023, the bank operated five branches and 15 deposit taking ATMs in the state, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$589.8 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 70 banks operating 272 branches in the state rating area. JPMCB ranked 33rd in deposit market share with 0.3 percent. Primary competitors include Principal Bank with 18.8 percent deposit market share, Wells Fargo Bank with 11.2 percent, Bankers Trust Company with 10 percent, and U.S. Bank with 8.6 percent.

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.

Des Moines MSA

The Des Moines MSA AA consists of Dallas and Polk counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 47 banks operating 167 branches in the AA. JPMCB operated four branches and ranked 25th in deposit market share with 0.4 percent. Primary competitors in the AA include Principal Bank with 26.3 percent deposit market share, Bankers Trust Company with 12.8 percent, and Wells Fargo Bank with 12.4 percent. As of December 31, 2023, JPMCB operated 13 deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Des Moines CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Des Moines MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	113	8.0	25.7	39.8	25.7	0.9
Population by Geography	527,261	5.7	21.6	39.5	33.2	0.0
Housing Units by Geography	218,577	5.1	21.7	41.5	31.7	0.0
Owner-Occupied Units by Geography	140,780	2.8	18.8	41.4	37.0	0.0
Occupied Rental Units by Geography	63,862	9.1	26.7	41.3	22.9	0.0
Vacant Units by Geography	13,935	9.6	28.6	43.0	18.7	0.0
Businesses by Geography	63,752	3.9	13.5	46.2	36.4	0.1
Farms by Geography	2,206	1.5	9.8	49.3	39.3	0.0
Family Distribution by Income Level	134,194	20.7	17.1	21.6	40.6	0.0
Household Distribution by Income Level	204,642	23.3	16.2	19.4	41.1	0.0
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$75,653	Median Housing Value			\$164,980
			Median Gross Rent			\$825
			Families Below Poverty Level			8.5%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Des Moines MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	131	6.1	23.7	43.5	25.2	1.5
Population by Geography	592,079	5.3	19.9	44.1	30.0	0.7
Housing Units by Geography	241,879	5.0	21.1	44.8	28.2	1.0
Owner-Occupied Units by Geography	153,702	3.4	17.9	46.8	31.5	0.4

Table A – Demographic Information of the Assessment Area Assessment Area: Des Moines MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	72,806	7.6	25.7	41.3	23.2	2.2
Vacant Units by Geography	15,371	7.9	30.7	40.5	19.3	1.6
Businesses by Geography	97,020	3.8	14.7	41.1	37.7	2.7
Farms by Geography	3,110	2.9	10.8	44.2	41.1	1.0
Family Distribution by Income Level	140,627	19.9	17.8	21.6	40.7	0.0
Household Distribution by Income Level	226,508	22.1	17.1	19.1	41.8	0.0
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$89,538	Median Housing Value			\$205,607
			Median Gross Rent			\$960
			Families Below Poverty Level			6.6%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Des Moines MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Des Moines MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Des Moines MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$946 according to 2015 ACS data and \$1,119 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,513 according to 2015 ACS data and \$1,791 according to 2020 Census data. The monthly mortgage payment for the median home in the Des Moines MSA would be \$886 using 2015 ACS data and \$1,104 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 37.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Des Moines MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Des Moines MSA, 8.5 percent of families had incomes below the FPL according to the 2015 ACS and 6.6 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Des Moines MSA was 2.5 percent compared to the Iowa state unemployment rate of 2.7 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Des Moines MSA backtracked in 2023, chipping away at what was once a sizable post-pandemic advantage. Total nonfarm employment was trending lower, making the metro area one of only a few dozen in which payrolls have declined. Finance was a main contributor, languishing at multiyear lows after declines that date back to mid-2021, and the rest of the economy was also failing to lend adequate support. The jobless rate was moving higher at a more rapid rate than it is nationally, while the labor force stagnated. State government was a key economic driver as Des Moines is the state capital. The housing market avoided a sustained correction, partly due to below-average price growth in the last several years. Population gains in the area have comfortably outpaced those of the Midwest and the nation for more than two decades. New residents were attracted to the metro area, due in large part to its ample high-wage opportunities and low living costs. The area's strengths included high per capita income, high educational attainment, low costs of living and doing business, and low poverty. Weaknesses included dependence on highly cyclical financial services and exposure to the volatile agriculture sector.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations that serve the area. These organizations focus on community and economic development and small business. Contacts noted that economic conditions in the area are generally good. Many jobs in the area are in finance, insurance and real estate. Contacts noted that most of the affordable housing in the area is older and needs rehabilitation. Community needs identified include:

- Affordable housing, including workforce housing
- Financing for start-up businesses
- Funding for working capital and inventory financing for growing small businesses
- Access to capital for restaurants and other hospitality focused businesses

Scope of Evaluation in State of Iowa

Examiners selected the Des Moines MSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Iowa. The MSA accounts for 91 percent of the bank's adjusted deposits and 68.8 percent of lending in the state. The Cedar Rapids MSA received a limited-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

LENDING TEST

The bank's performance under the Lending Test in the state of Iowa is rated Low Satisfactory. Performance in the limited-scope AA supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Des Moines MSA	925	5,832	138	38	6,933	68.9	91.2
Limited-Scope							
Cedar Rapids CSA	178	2,878	68	3	3,127	31.1	8.9
Broader Statewide/Regional Area							
Direct Benefit				1	1		
Indirect Benefit				1	1	0.0	
Total	1,103	8,710	206	43	10,062	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Des Moines MSA	223,889	64,657	1,540	179,175	469,261	79.6	91.2
Limited-Scope							
Cedar Rapids CSA	35,199	31,214	766	47,936	115,115	19.5	8.8
Broader Statewide/Regional Area							
Direct Benefit				4,286	4,286	0.7	
Indirect Benefit				1,103	1,103	0.2	
Total	259,088	95,871	2,306	232,500	589,765	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.4 percent. The bank ranked 25th among 47 depository financial institutions placing it in the top 54 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 65th among 369 home mortgage lenders in the AA, which placed it in the top 18 percent of lenders. The top three lenders were Greenstate Credit Union (14.8 percent), Veridian Credit Union (10.6 percent), and Community Choice Credit Union (4.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 15.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 94 small

business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (21.8 percent), U.S. Bank (11.7 percent), and Capital One (10.5 percent).

In overall small loans to farms for 2022, the bank had a market share of 17.7 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 21 small farm lenders in the AA, which placed it in the top 10 percent of lenders. The other top lenders were John Deere Financial (27.7 percent), U.S. Bank (12.3 percent), and United Bank of Iowa (7.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Iowa 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Iowa 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the state of Iowa 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and well below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was weaker than the performance in 2022 through 2023 due to lower distributions of lending in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers approximated the percentage of low-income families and exceeded the aggregate distribution of loans. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of low-income families and moderate-income families and the aggregate distributions of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and

exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Iowa 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending to farms with gross annual revenues of \$1 million or less.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Des Moines MSA. CD lending had a negative effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 40 loans in the amount of \$11.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	12	1,791
Chase Homebuyer Grant Loans	6	1,183
Homebuyer Education Grants	5	3
Community Lending Program (Correspondent SPCP)	3	477
Business Card SPCP	2	6
Paycheck Protection Program (PPP)	12	8,263
Total	40	11,723

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Iowa.

The bank made one CD loan totaling \$4.3 million to a borrower in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan supported community service.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered a \$1.1 million of CD loan in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. This CD loan was a PPP loan that supported revitalization and stabilization efforts in response to the COVID-19 pandemic.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Cedar Rapids CSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall Lending Test conclusion.

Refer to Tables O through T in the state of Iowa 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 Iowa is rated Outstanding. Performance in the limited-scope AA and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, often in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 182.2 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Des Moines MSA	13	8,891	4	12,478	17	32.7	21,370	31.0	0	0
Limited-Scope										
Cedar Rapids CSA	3	5,161	1	1,704	4	7.7	6,865	10.0	0	0
Broader Statewide/Regional Area										
Indirect Benefit	17	14,471	14	26,248	31	59.6	40,719	59.1	0	0
Total	33	28,523	19	40,430	52	100.0	68,953	100.0	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with all investments supporting affordable housing.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made four LIHTC investments totaling \$12.5 million that supported 208 affordable housing units. Qualified investments made during the evaluation period include:

- An \$8.2 million LIHTC investment to develop a 72-unit apartment building in a middle-income geography. The development will have 64 units dedicated to individual and families earning 60 percent or less of the AMI.
- A \$2 million LIHTC equity investment to support affordable housing in a middle-income geography. The investment supported the rehabilitation of the property, which preserved 68, one-bedroom apartment units targeted to low- and moderate-income seniors and persons with disabilities.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Cedar Rapids CSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall Investment Test conclusion for the state of Iowa.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Iowa. Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$40.7 million of current- and prior-period investments in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to serve those AAs. These investments included LIHTCs that supported 1,211 affordable units, HTCs, and NMTCs.

SERVICE TEST

The bank's performance under the Service Test in the state of Iowa is rated Outstanding. Performance in the limited-scope AA supported the Service Test conclusion for the state of Iowa.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Des Moines MSA	91.2	4	80.0	0.0	50.0	50.0	0.0	0.0	5.3	19.9	44.1	30.0	0.7
Limited-Scope													
Cedar Rapids CSA	8.8	1	20.0	100.0	0.0	0.0	0.0	0.0	4.0	23.7	43.5	28.1	0.7
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 13 deposit-taking ATMs in the AA, of which none were in low-income geographies and 53.8 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Des Moines MSA	4	0	0	2	1	1	0
Limited-Scope							
Cedar Rapids CSA	1	0	1	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened four branches, of which two were in moderate-income geographies. There were no branches opened in low-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Des Moines MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 176 qualified CD service activities to 14 organizations, for a total of 285 hours. A majority of the bank's assistance was to organizations providing financial education targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with improving financial health for underserved populations.

Service activities during the evaluation period include:

- JPMCB partnered with a nonprofit to support their economic empowerment programs and provided financial literacy education to 175 students in low- and moderate-income schools. The training covered income, expenses, savings, and credit.
- JPMCB employees provided technical assistance and training to nonprofit organizations. JPMCB, in partnership with a strategic communication organization that partners with nonprofits and foundations, facilitated a training program aimed to equip nonprofit leaders with the resources and support needed to learn strategies to effectively share their vision and inspire action.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Cedar Rapids CSA was consistent the bank's overall performance under the Service Test in the full-scope area. Performance in the limited-scope AA supported the Service Test conclusion for the state of Iowa.

State of Kansas

CRA rating for the state of Kansas²⁰: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- CD lending in the broader statewide or regional had a positive impact on the Lending Test conclusion.
- An overall excellent level of qualified investments that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AA. Investments in the broader statewide or regional areas positively impacted the overall conclusion.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Kansas

Examiners assessed performance in a single AA in the state of Kansas rating area. This AA was comprised of the entire Manhattan, KS (Manhattan) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Kansas is JPMCB's 57th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$70,000 in deposits in the state of Kansas, all of which represent retail branch deposits. As of December 31, 2023, the bank operated one branch and two deposit taking ATMs in the rating area, representing less than 0.1 percent of total branches and less than 0.1 percent of total ATMs. The bank originated and purchased approximately \$75.8 million in loans, or less than 0.1 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 52 branches in the state rating area. JPMCB ranked last in deposit market share with which was negligible, less than one percent. Primary competitors include KS State Bank with 31.9 percent deposit market share, Central National Bank with 9.9 percent, and Bank of the Flint Hills with 7.7 percent.

The Manhattan MSA AA consists of Geary, Pottawatomie, and Riley counties. JPMCB operated one

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.

branch and two deposit taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Manhattan MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Manhattan MSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	30.8	38.5	23.1	7.7
Population by Geography	134,434	0.0	26.5	41.1	30.4	2.0
Housing Units by Geography	53,484	0.0	24.5	44.1	30.5	1.0
Owner-Occupied Units by Geography	22,887	0.0	14.8	45.4	39.5	0.3
Occupied Rental Units by Geography	24,495	0.0	31.3	43.9	23.1	1.6
Vacant Units by Geography	6,102	0.0	33.4	39.6	26.2	0.8
Businesses by Geography	7,809	0.0	24.2	40.0	35.3	0.6
Farms by Geography	497	0.0	15.7	40.8	43.5	0.0
Family Distribution by Income Level	28,857	19.5	21.6	20.9	38.0	0.0
Household Distribution by Income Level	47,382	21.8	17.7	20.0	40.5	0.0
Median Family Income MSA - 31740 Manhattan, KS MSA		\$61,327	Median Housing Value			\$150,534
			Median Gross Rent			\$912
			Families Below Poverty Level			7.9%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Manhattan MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	9.1	18.2	39.4	27.3	6.1
Population by Geography	134,046	6.8	22.7	36.7	31.6	2.2
Housing Units by Geography	56,330	6.5	19.8	39.5	33.2	1.0
Owner-Occupied Units by Geography	23,860	2.9	12.4	39.1	45.5	0.2
Occupied Rental Units by Geography	24,767	8.4	27.6	39.3	22.7	1.9
Vacant Units by Geography	7,703	11.7	17.4	41.6	28.6	0.7
Businesses by Geography	9,247	7.0	11.2	42.5	38.8	0.5
Farms by Geography	590	2.5	11.4	49.7	36.4	0.0
Family Distribution by Income Level	29,779	21.4	17.1	21.4	40.2	0.0
Household Distribution by Income Level	48,627	22.7	16.7	19.6	40.9	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Manhattan MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 31740 Manhattan, KS MSA		\$70,357	Median Housing Value			\$171,390
			Median Gross Rent			\$939
			Families Below Poverty Level			11.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Manhattan MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Manhattan MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Manhattan MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$767 according to 2015 ACS data and \$879 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,227 according to 2015 ACS data and \$1,407 according to 2020 Census data. The monthly mortgage payment for the median home in the Manhattan MSA would be \$808 using 2015 ACS data and \$920 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 33.3 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Manhattan MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Manhattan MSA, 7.9 percent of families had incomes below the FPL according to the 2015 ACS and 11 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Manhattan MSA was 1.7 percent compared to the state of Kansas at 2 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Manhattan, KS area's economy was among the top performers in the Midwest. Job gains outpaced the state, led by strong payroll growth in the public sector. Goods-producing industries recouped lost jobs, while private services inched higher. High-wage industries led employment gains, which was reflected in a sharp rise in average hourly earnings. The jobless rate hovered below 3 percent for the past

year, as the labor market easily absorbs new entrants. Relative to the population base, the area had an outsized concentration of military personnel, particularly compared with its Midwest peers. The state's largest employer, Fort Riley, lend vital support to local businesses. As home to the 1st Infantry Division of the U.S. Army, the base also draws a steady stream of visiting troops for training operations, bolstering support for consumer services. The housing market was cooling down. Single-family prices were softening, and construction was weak. The area's strengths included the stabilizing presence of Fort Riley and Kansas State University, an abundance of skilled labor, increased public and private investments, and low costs of living and doing business. Weaknesses included a high concentration of low-wage services, below-average incomes and worker productivity, and weak migration trends.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations that serve the area. These organizations focus on affordable housing and community development. Contacts noted that the economy in the area is generally stable due to the presence of Fort Riley. The population in the area is cyclical due to the presence of military families and students. The housing in the area is primarily non-owner-occupied rentals and the community has been resistant to new housing development. Much of the housing being developed is luxury rental which skews average rent costs. Seniors and low-income households are most impacted as many of them pay a significant portion of their incomes towards housing costs. The primary needs identified by contacts include affordable housing, including workforce housing and affordable childcare. In addition, contacts noted that they would like to see area financial institutions provide sponsorship for the Federal Home Loan Bank Affordable Housing Program (AHP) grant application process.

Scope of Evaluation in State of Kansas

Examiners selected the Manhattan MSA for full-scope review. There were no other AAs within the state of Kansas. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Manhattan MSA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusions for small loans to farms are based solely on performance during the 2022 through 2023 analysis period for that AA.

There were no low-income geographies in the Manhattan MSA during the 2020 through 2021 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in the state of Kansas is rated High Satisfactory. CD lending in the broader statewide or regional areas had a positive impact on the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Manhattan MSA	80	3,423	44	0	3,547	99.8	100.0
Broader Statewide/Regional Area							
Indirect Benefit				2	2	0.2	
Total	80	3,423	44	2	3,549	100.0	100.00

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Manhattan MSA	16,991	38,068	433	0	55,492	54.9	100.0
Broader Statewide/Regional Area							
Indirect Benefit				20,312	20,312	45.1	
Total	16,991	38,068	433	20,312	75,804	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

According to FDIC deposit data as of June 30, 2023, the bank had a deposit market share of less than 0.1 percent. The bank ranked last among 22 depository financial institutions, placing it in the top 100 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 53rd among 214 home mortgage lenders in the AA, which placed it in the top 25 percent of lenders. The top three lenders were Mortgage Research Center (8.1 percent), Landmark National Bank (5.9 percent), and Community First National Bank (5.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 15.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 40 small business lenders in the AA, which placed it in the top 8 percent of lenders. The other top lenders were American Express (20.7 percent), Capital One (19 percent), and Citibank (8 percent).

In overall small loans to farms for 2022, the bank had a market share of 15.7 percent based on the number of small loans to farms originated or purchased. The bank ranked third among 13 small farm lenders in the AA, which placed it in the top 24 percent of lenders. The other top lenders were John Deere Financial (43.5 percent), KS Statebank (21.3 percent), and Capital One (3.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. During the 2020 through 2021 analysis period, there were no low-income geographies in the bank's AA.

Home Mortgage Loans

Refer to Table O in the state of Kansas 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies but was below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Kansas 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of Kansas 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms located in a low-income tract within the AA. The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in those geographies but was below the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below both the percentage of low-income families and the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Kansas 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Manhattan MSA. CD lending had a negative effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of eight loans in the amount of \$887,000 were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	2	396
Chase Homebuyer Grant Loans	1	72
Homebuyer Education Grants	1	1
Veteran's Administration (VA)	1	197
VA Purchase Closing Credit	1	197
Paycheck Protection Program (PPP)	2	24
Total	8	887

Broader Statewide or Regional Lending

Broader statewide or regional CD lending improved the Lending Test rating for the state of Kansas.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$20.3 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans supported community service and revitalization and stabilization efforts in response to the COVID-19 pandemic.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Kansas is rated Outstanding. Investments in the broader statewide or regional areas positively impacted the overall Investment test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, although rarely in a leadership position, particularly those that were not routinely provided by private. The dollar volume of current- and prior-period investments represented 14,508 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Manhattan MSA	1	850	1	206	2	5.9	1,057	0.2	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	1	14	1	2.9	14	0.0	0	0
Indirect Benefit	11	4,184	20	450,782	31	91.2	454,966	99.8	0	0
Total	12	5,034	22	451,002	34	100.0	456,037	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited adequate responsiveness to credit and community economic development needs. While all investments supported affordable housing, the current period investment was a \$206,000 MBS that financed an affordable single-family home.

The bank did not use innovative and/or complex investments to support CD initiatives during this evaluation period.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas positively impacted the Investment Test rating for the state of Kansas. The bank made a grant totaling \$13,829 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. This investment promoted community services.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$455 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve

the AA. These investments included LIHTCs that supported 1,149 affordable units and a renewable energy tax credit investment.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Manhattan MSA	100.0	1	100.0	0.0	100.0	0.0	0.0	0.0	6.8	22.7	36.7	31.6	2.2
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank had one branch located in a moderate-income geography. The branch distribution in moderate-income geography exceeded the percentage of the population living within the geography.

The bank had several ADS including ATMs, online banking, and mobile banking options. JPMCB had two deposit-taking ATMs in the AA, both of which were in moderate-income geographies. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Manhattan MSA	1	0	0	1	0	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and

moderate-income individuals. During the evaluation period, the bank entered the AA and opened one branch in a moderate-income geography. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at the one branch in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Manhattan MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 37 qualified CD service activities to 11 organizations, for a total of 40 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling services.

Examples of CD services provided in this AA include:

- JPMCB partnered with CCAs to provide credit counseling and debt education to 35 low- and moderate-income individuals.
- A bank employee provided technical assistance and education training for small businesses, impacting 40 individuals. The seminar delivered curriculum on business fundamentals and how to grow businesses.

State of Kentucky

CRA rating for the state of Kentucky²¹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the state of Kentucky

Examiners assessed performance in four AAs in the state of Kentucky rating area. These were comprised of portions of the Lexington-Fayette--Richmond—Frankfort, KY (Lexington) CSA, Bowling Green, KY (Bowling Green) MSA and Owensboro, KY (Owensboro) MSAs, and a single county in the non-MSA Kentucky AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Kentucky is JPMCB's 26th largest rating area based on deposits. As of June 30, 2023, the bank had approximately \$2.8 billion in deposits in the state of Kentucky rating area, of which approximately \$2.7 billion represent retail branch deposits. As of December 31, 2023, the bank operated 17 branches and 31 deposit taking ATMs in the state, representing 0.3 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$1 billion in loans, or 0.2 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 50 banks operating 264 branches in the state rating area. JPMCB ranked first in deposit market share with 12.9 percent. Primary competitors include Central Bank & Trust Company with 9.1 percent deposit market share, Fifth Third Bank with 7.6 percent, PNC Bank and Truist Bank, each with 6.7 percent.

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.

Lexington CSA

The Lexington CSA AA consists of Fayette, Jessamine, and Madison counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 37 banks operating 169 branches in the AA. JPMCB operated 14 branches in the AA and was ranked first in deposit market share with 16.8 percent. Primary competitors include Central Bank & Trust Company with 14.2 percent deposit market share, Fifth Third Bank with 11.4 percent, and Bank of America with 8.1 percent. As of December 31, 2023, the bank operated 24 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Lexington CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Lexington CSA 2020-2021						
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	48,639	5.9	18.1	39.1	36.9	0.0
Farms by Geography	1,802	4.7	13.2	39.1	43.1	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%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Lexington CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	8.1	19.4	36.3	33.9	2.4
Population by Geography	468,262	6.8	19.2	36.9	35.2	2.0
Housing Units by Geography	200,405	6.8	19.8	37.6	33.9	1.9
Owner-Occupied Units by Geography	104,769	3.2	14.9	38.3	43.2	0.4

Table A – Demographic Information of the Assessment Area Assessment Area: Lexington CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	78,921	10.5	25.9	36.9	22.8	3.8
Vacant Units by Geography	16,715	11.2	21.9	36.4	28.1	2.4
Businesses by Geography	64,896	4.8	17.5	34.4	37.8	5.5
Farms by Geography	2,398	3.3	12.4	41.0	39.9	3.3
Family Distribution by Income Level	109,764	21.4	15.7	19.4	43.4	0.0
Household Distribution by Income Level	183,690	24.1	15.8	16.9	43.3	0.0
Median Family Income MSA - 30460 Lexington-Fayette, KY MSA		\$78,944	Median Housing Value			\$201,099
Median Family Income Non-MSAs - KY		\$54,327	Median Gross Rent			\$880
			Families Below Poverty Level			10.4%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Lexington CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Lexington CSA, low- and some moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Lexington CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$575 to \$835 according to 2015 ACS data and from \$679 to \$987 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$920 to \$1,336 according to 2015 ACS data and ranging from \$1,087 to \$1,579 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Lexington CSA would be \$936 using 2015 ACS data and \$1,080 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.5 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Lexington CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Lexington CSA, 13 percent of families had incomes below the FPL according to the 2015 ACS and 10.4 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Lexington CSA was 3.1 percent compared to the Kentucky state unemployment rate of 3.8 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Lexington CSA's economy gained momentum. The pace of net hiring pulled further ahead of the nation's and was tracking closer to the state's performance. State government employment, largely tied to the University of Kentucky, has been a consistent contributor, offsetting softness in the sizable manufacturing sector. The unemployment rate was rising due to a growing labor force. Although house price growth has paused after a sharp rise in the spring of 2023, the area avoided a house price correction in 2022, putting the metro area well ahead of the national average on a year-over-year basis. Lexington is home to Toyota's largest production facility, driving one of the highest concentrations of automobile and parts production outside of the Midwest. The University of Kentucky is also a key driver of the area's economy. It was a top employer and experienced rising enrollment. However, the area struggled to retain new graduates and younger workers. The area experienced increasing out-migration since the onset of the pandemic, with 25- to 44-year-olds leaving at a faster rate than other age cohorts. The area's strengths included low business costs, a university presence that provides stability and an educated workforce, and abundant development land. Weaknesses included a high reliance on state government, population growth that lags the national pace, and a lack of high paying job opportunities outside of manufacturing.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations that serve the area. One of the contacts included a listening session conducted with representatives of several organizations. These organizations focus on affordable housing, small business and economic development, and community services. Contacts noted that the region is growing, and the economy is good. However, housing inventory is low, and it is becoming more difficult for younger families and low- and moderate-income households to purchase homes as they are being priced out. New college graduates are not staying in the area. Lack of access to transportation and affordable childcare serve as barriers for lower income individuals looking to obtain and retain employment. There is a significant refugee population in the area. Many of these new arrivals are entrepreneurial, however, they have trouble accessing the financing to start a business. Other needs identified in the area include:

- Workforce housing
- Support for infrastructure improvements that will allow for affordable housing development
- Affordable childcare
- Affordable rental housing
- Start-up funding and technical assistance for small businesses, including financial education
- Investments and support for MDIs
- Small dollar loans

Scope of Evaluation in State of Kentucky

Examiners selected the Lexington CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Kentucky. The CSA accounts for 83.2 percent of the bank's deposits, based on FDIC deposit data, and 87 percent of lending in the state. The Bowling Green and Owensboro MSAs and the non-MSA Kentucky AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Bowling Green and Owensboro MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusions for small loans to farms are based solely on performance during the 2022 through 2023 analysis period for those AAs.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Kentucky AA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

There were no low-income geographies in the non-MSA Kentucky AA and no low-income geographies in the Owensboro MSA during the 2022 through 2023 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Lexington CSA	2,243	7,086	254	5	9,588	76.9	83.4
Limited-Scope							
Bowling Green MSA	205	1,269	35	0	1,509	12.1	3.4
Owensboro MSA	153	803	39	1	996	8.0	9.8
Non-MSA KY	93	254	14	0	361	2.9	3.4
Broader Statewide/Regional Area							
Indirect Benefit				7	7	0.1	
Total	2,694	9,412	342	13	12,461	100.0	100.0

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Lexington CSA	691,750	155,173	7,945	39,123	893,991	87.1	83.4
Limited-Scope							
Bowling Green MSA	46,701	15,653	319		62,673	6.1	3.4
Owensboro MSA	23,684	11,207	328	719	35,938	3.5	9.8
Non-MSA KY	17,122	4,487	108	0	21,717	2.1	3.4
Broader Statewide/Regional Area							
Indirect Benefit				12,365	12,365	1.2	
Total	779,257	186,520	8,700	52,207	1,026,684	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 16.8 percent. The bank ranked first among 37 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 12th among 373 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were Mortgage Research Center (8.1 percent), Landmark National Bank (5.9 percent), and Community First National Bank (5.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 77 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (33.6 percent), Bank of America (7.3 percent), and Capital One (5.7 percent).

In overall small loans to farms for 2022, the bank had a market share of 28.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 23 small farm lenders in the AA, which placed it in the top 5 percent of lenders. The other top lenders were Whitaker Bank Inc (25.5 percent), John Deere Financial (12.4 percent), and US Bank (8.4 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was weaker than the performance in 2022 through 2023 due to a lower distribution of lending in low-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's small business lending performance was stronger than the performance in 2022 through 2023 due to better distributions of lending in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's small farm lending performance was stronger than the performance in 2022 through 2023 due to a better distribution of lending in low-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's home mortgage lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's small business lending performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Kentucky 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to farms with gross annual revenues of \$1 million or less.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made five CD loans totaling \$39.1 million, which represented 16.9 percent of the allocated tier 1 capital. By dollar volume, 96.7 percent of these loans funded affordable housing and 3.3 percent funded revitalization and stabilization efforts. Of the total CD loans, three were PPP loans totaling \$1.3 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period also included a \$18.9 million construction loan for an affordable housing development in a low-income geography. This loan supported the rehabilitation and preservation of 92 affordable housing units and the creation of an additional 40 units, all of which are targeted to seniors earning 60 percent or less of the AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices to meet AA credit needs. As shown in the table below, a total of 1,345 loans in the amount of \$146.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	257	43,200
Federal Housing Administration (FHA)	13	2,755
Chase Homebuyer Grant Loans	134	23,412
Homebuyer Education Grants	124	62
Home Lending SPCP	6	1,067
Community Lending Program (Correspondent SPCP)	2	435
Veteran's Administration (VA)	7	2,370
VA Purchase Closing Credit	2	487
Paycheck Protection Program (PPP)	800	72,951
Total	1,345	146,739

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Kentucky.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$12.4 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans were PPP loans that supported revitalization and stabilization efforts in response to the COVID-19 pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bowling Green MSA, Owensboro MSA, and non-MSA Kentucky AA was weaker than the bank's performance in the full-scope area due to a lower geographic distribution of loans and/or lower levels of CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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. Performance in the limited-scope AAs had a neutral impact on the overall conclusion and investments in the broader statewide or regional areas supported the overall conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 17.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made one qualifying grant and donation totaling \$25,000 to an organization in the AA.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Lexington CSA	10	15,374	6	26,030	16	16.3	41,405	30.1	0	0
Limited-Scope										
Bowling Green MSA	7	975	0	0	7	7.1	975	0.7	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Owensboro MSA	3	387	2	14,576	5	5.1	14,963	10.9	0	0
Non-MSA KY	1	348	0	0	1	1.0	348	0.3	0	0
Broader Statewide/Regional Area										
Indirect Benefit	49	16,310	20	63,387	69	70.4	79,698	58.0	0	0
Total	70	33,394	28	103,993	98	100.0	137,388	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and CD needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.9 percent of investments supported affordable housing and 0.1 percent funded community services to low- and moderate-income individuals.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made five LIHTC investments totaling \$26 million that supported 564 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$15.6 million LIHTC investment in a 132-unit affordable housing development in a low-income geography. The project includes the renovation of an existing building and the construction of a new building. All units will be restricted to individuals and families earning 60 percent or less of the AMI, with the targeted tenant population being seniors aged 62 or greater.
- A \$25,000 grant to a local organization that supports workforce development in the bank's AA. The organization serves residents of impoverished neighborhoods that do have access to computers and stable internet connections. The organization provided computer and information technology training to area resident earning 80 percent or less of the AMI.

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 and Owensboro MSA was consistent with the bank's performance in the full-scope area. Performance in non-MSA Kentucky was weaker than the bank's performance in the full-scope area due to a lower level of investment activity. Performance in the limited-scope AAs did not impact the Investment Test conclusion for the state of Kentucky.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Kentucky. Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$79.7 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve

those AAs. These investments included LIHTCs that supported 1,207 affordable units and one MBS used to finance the acquisition and rehabilitation of 294 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of Kentucky is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Kentucky.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Lexington CSA	83.4	13	76.5	0.0	15.4	38.5	38.5	7.7	6.8	19.2	36.9	35.2	2.0
Limited-Scope													
Bowling Green MSA	3.4	1	5.9	0.0	100.0	0.0	0.0	0.0	2.6	23.7	39.2	32.4	2.1
Owensboro MSA	9.8	2	11.8	0.0	0.0	0.0	100.0	0.0	0.0	21.1	55.3	21.7	2.0
Non-MSA KY	3.4	1	5.9	0.0	100.0	0.0	0.0	0.0	0.0	10.8	29.0	60.2	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank did not have any branches in low-income geographies. The bank's distribution of branches in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered six branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Lexington CSA included two Community Branches, none of which were in low-or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 24 deposit-taking ATMs in the AA, of which 12.5 percent were in moderate-income geographies. There were no deposit-taking ATMs in low-income geographies. JPMCB provided

data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Lexington CSA	0	2	0	-1	-1	0	0
Limited-Scope							
Bowling Green MSA	0	0	0	0	0	0	0
Owensboro MSA	0	1	0	0	-1	0	0
Non-MSA KY	0	0	0	0	0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							
<i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

To the extent changes have been made, the bank's opening and closing of branches generally 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 did not open any branches, and the bank closed two branches, of which one was in a moderate-income geography. The branch closures were due to reduced customer usage and proximity to other JPMCB branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at the branch in the AA. Business hours were generally Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 12:00 p.m. or 1:00 p.m. on Saturdays. There were 12 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Lexington CSA.

Bank records show that during the evaluation period, employees provided their financial or job-specific expertise and/or technical assistance for 416 qualified CD service activities to 26 organizations, for a total of 809 hours. A majority of the bank's assistance was delivered through partnerships with nonprofit organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by one bank employee spending 110 hours participating on the board for an area CD organization. The bank's assistance was responsive to needs identified in the AA, particularly with improving financial education for underserved populations.

Examples of CD services provided in this AA include:

- The bank partnered with a nonprofit organization for a HUD-approved homebuyer education class to empower participants to budget and create a debt management plan to improve their credit score.

- A bank employee served on the board of a nonprofit whose mission is to prevent the abuse and neglect of children and adults by supporting families in crisis through education, counseling, advocacy, and resources.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bowling Green MSA and non-MSA Kentucky was stronger than the bank's performance in the full-scope area due to a higher percentage of branch distribution in moderate-income geographies. Performance under the Service Test in the Owensboro MSA was weaker than the bank's performance in the full scope area due to no branch locations in low- or moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Kentucky.

State of Louisiana

CRA Rating for the State of Louisiana: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated good responsiveness to meet the credit and CD needs of the bank's AAs. Weaker performance in the limited-scope AAs was partially offset by investments in the broader statewide or regional area.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Louisiana

Examiners assessed performance in nine AAs in the state of Louisiana rating area. These were comprised of a majority of the New Orleans-Metairie-Hammond, LA-MS (New Orleans) CSA and Lafayette-Opelousas-Morgan City, LA (Lafayette) CSA, a majority of the Shreveport-Bossier City, LA (Shreveport) MSA, the entire Houma-Thibodaux, LA (Houma) MSA, a portion of the Monroe-Ruston, LA (Monroe) CSA, portions of the Alexandria, LA (Alexandria) MSA, Baton Rouge, LA (Baton Rouge) MSA and Lake Charles, LA (Lake Charles) MSAs, and two counties²² in the non-MSA Louisiana AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Louisiana is JPMCB's 12th largest rating area. As of June 30, 2023, the bank had approximately \$23.8 billion in deposits in the state of Louisiana rating area, of which approximately \$21.1 billion represent retail branch deposits. As of December 31, 2023, the bank operated 101 branches and 308 deposit taking ATMs in the state rating area, representing 2.1 percent of total branches and 2 percent of total ATMs. The bank originated and purchased approximately \$4.1 billion in loans, or 0.6 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 101 banks operating 1,002 branches in the state rating area. JPMCB ranked first in deposit market share with 20.2 percent. Primary competitors include Capital One with 18.2 percent, Hancock Whitney Bank with 13.2 percent, and Regions Bank with 6.5 percent.

²² County-equivalents are known as parishes in Louisiana. For the purposes of this evaluation, they are treated the same, and will be referred to, as counties.

New Orleans CSA

The New Orleans CSA consists of Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, and Tangipahoa Parishes. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 34 banks operating 318 branches in the AA. JPMCB operated 33 branches in the AA and was ranked third in deposit market share with 17.3 percent. Primary competitors include Capital One with 28 percent deposit market share, Hancock Whitney Bank with 18.5 percent, and Regions Bank with 7.3 percent. As of December 31, 2023, the bank operated 119 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the New Orleans CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: New Orleans CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	409	15.9	24.7	28.9	26.7	3.9
Population by Geography	1,319,934	9.3	24.2	35.8	29.9	0.8
Housing Units by Geography	585,536	11.0	24.5	33.8	29.8	0.9
Owner-Occupied Units by Geography	310,574	5.1	19.6	39.4	35.5	0.4
Occupied Rental Units by Geography	193,449	17.7	30.5	27.9	22.6	1.4
Vacant Units by Geography	81,513	18.0	29.0	26.2	25.2	1.5
Businesses by Geography	197,546	8.7	20.6	30.7	38.8	1.1
Farms by Geography	3,224	5.5	19.1	41.9	32.9	0.6
Family Distribution by Income Level	314,327	25.1	15.8	17.3	41.9	0.0
Household Distribution by Income Level	504,023	26.6	15.0	15.4	43.1	0.0
Median Family Income MSA - 25220 Hammond, LA MSA		\$52,864	Median Housing Value			\$191,080
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$61,124	Median Gross Rent			\$913
			Families Below Poverty Level			14.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: New Orleans CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	444	11.5	26.6	26.6	30.4	5.0
Population by Geography	1,361,295	8.8	25.6	31.4	32.8	1.3
Housing Units by Geography	597,140	9.0	26.6	30.7	32.1	1.7

Table A – Demographic Information of the Assessment Area Assessment Area: New Orleans CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	331,343	5.4	21.4	34.9	37.3	0.9
Occupied Rental Units by Geography	187,207	14.2	35.4	25.7	22.5	2.2
Vacant Units by Geography	78,590	11.3	27.4	24.7	33.0	3.6
Businesses by Geography	260,140	7.2	23.0	29.7	38.3	1.7
Farms by Geography	4,467	5.2	20.7	38.2	34.8	1.1
Family Distribution by Income Level	310,921	25.0	15.3	18.1	41.6	0.0
Household Distribution by Income Level	518,550	27.1	14.4	15.5	43.0	0.0
Median Family Income MSA - 25220 Hammond, LA MSA		\$62,373	Median Housing Value			\$228,171
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$72,053	Median Gross Rent			\$1,027
			Families Below Poverty Level			12.6%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the New Orleans CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the New Orleans CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the New Orleans CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$661 to \$764 according to 2015 ACS data and from \$780 to \$901 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,057 to \$1,222 according to 2015 ACS data and ranging from \$1,247 to \$1,441 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the New Orleans CSA would be \$1,026 using 2015 ACS data and \$1,225 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 24.3 percent from the first quarter of 2020 to the fourth quarter of 2023 in the New Orleans MSA and by 20.6 percent in the Hammond MSA. This acceleration in home prices creates new affordability concerns in the New Orleans CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the New Orleans CSA, 14.8 percent of families had incomes below the

FPL according to the 2015 ACS and 12.6 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the New Orleans CSA was 3.8 percent compared to the Louisiana state unemployment rate of 3.8 percent and the national unemployment rate of 3.5 percent.

Economic Data

New Orleans' port is a major player in the local economy, notably due to revenue increases from cruises that are back from the pandemic. Healthcare and the refining industries contributed to some employment growth, but wage growth has struggled. Hiring in high-paying positions was slower than the national average, whereas low-paying employment was growing rapidly. The area's strengths included a well-developed port, pipeline and rail infrastructure, and large-scale investments in energy and manufacturing. Weaknesses included many low-paying jobs in gaming and tourism, susceptibility to boom-bust cycles in energy driving above-average employment volatility, and weak migration patterns.

Community Contacts

Examiner reviewed two community contacts completed during the evaluation period with organizations serving the area. These organizations focus affordable housing and economic development. Contacts noted that the community is still recovering from the long-term impact of hurricanes Katrina and Ida. Credit and CD needs identified include:

- Affordable housing
- Small business lending
- Workforce development

Opportunities for participation by financial institutions include small-scale multifamily rental affordable housing finance, first-time homebuyer financing, and consumer and small business access to credit.

Scope of Evaluation in State of Louisiana

Examiners selected the New Orleans CSA for full-scope review as it represented the largest concentration of lending and branches in the state of Louisiana. The CSA accounts for 35.1 percent of the bank's adjusted deposits and 47.3 percent of lending in the state. The Alexandria, Baton Rouge, Houma, Lake Charles, Monroe, and Shreveport MSAs, Lafayette CSA, and non-MSA Louisiana AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Alexandria MSA, Lake Charles MSA, and non-MSA Louisiana AA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for those AAs.

There were no low- or moderate-income geographies in the non-MSA Louisiana AA. Lending test conclusions were based solely on the borrower distribution of lending and Service Test conclusions were based on performance context.

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 Outstanding. Performance in the limited-scope AAs supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
New Orleans CSA	4,645	28,366	244	44	33,299	47.3	34.9
Limited-Scope							
Alexandria MSA	165	935	45	NA	1,145	1.6	1.9
Baton Rouge MSA	1,997	11,614	112	20	13,743	19.5	37.2
Houma MSA	803	2,059	56	7	2,925	4.2	3.2
Lafayette CSA	1,164	8,221	175	9	9,569	13.6	9.4
Lake Charles MSA	450	2,611	42	4	3,107	4.4	4.1
Monroe CSA	350	1,779	79	4	2,212	3.1	3.7
Shreveport MSA	459	3,237	85	14	3,795	5.4	5.3
Non-MSA LA	78	414	46	1	539	0.8	0.3
Broader Statewide/Regional Area							
Direct Benefit				1	1	0.0	
Indirect Benefit				5	5	0.0	
Total	10,050	60,654	904	109	71,717	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
New Orleans CSA	1,274,553	574,476	2,124	353,517	2,204,670	54.0	34.9
Limited-Scope							
Alexandria MSA	24,247	14,066	615	0	38,928	1.0	1.9
Baton Rouge MSA	501,140	262,779	1,147	17,806	782,872	19.2	37.2
Houma MSA	141,339	35,024	528	12,046	188,937	4.6	3.2
Lafayette CSA	209,231	146,403	1,879	19,180	376,693	9.2	9.4
Lake Charles MSA	88,445	57,367	647	2,415	148,874	3.6	4.1
Monroe CSA	60,981	32,484	846	42,791	137,102	3.4	3.7

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Shreveport MSA	78,907	65,667	1,205	28,235	174,014	4.3	5.3
Non-MSA LA	11,699	5,112	617	6,670	24,098	0.6	0.3
Broader Statewide/Regional Area							
Direct Benefit				350	350	0.0	
Indirect Benefit				3,151	3,151	0.1	
Total	2,386,207	1,210,289	9,711	486,161	4,092,368	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 17.3 percent. The bank ranked third among 34 depository financial institutions, placing it in the top 9 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 11th among 463 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were GMFS (6.3 percent), Hancock Whitney Bank (6.1 percent), and Rocket Mortgage (5.6 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 109 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (26.9 percent), Capital One (10 percent), and Lake Forest Bank & Trust (6.6 percent).

In overall small loans to farms for 2022, the bank had a market share of 52.1 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 16 small farm lenders in the AA. The other top lenders were Capital One (11.3 percent), John Deere Financial (8.5 percent), and Wells Fargo Bank (6.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

Refer to Table Q in the 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 tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of lending in low-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of lending in low-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Louisiana 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 44 CD loans totaling \$353.5 million, which represented 46.2 percent of the allocated tier 1 capital. By dollar volume, 83.4 percent funded community services targeted to low- and moderate-income individuals, 10.2 percent funded revitalization and stabilization efforts, 6.3 percent of these loans funded affordable housing, and 0.1 percent funded economic development. Of the total CD loans, the bank made 34 PPP loans totaling \$29 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$4.4 million loan to develop a new health clinic in New Orleans and renovate an existing health clinic in Harvey. The health centers are expected to create 54 permanent full-time jobs and serve over 7,800 low-income individuals annually.
- A \$8.2 million construction loan for a new apartment development that contain 67 units with 53 units restricted to households with incomes at 20 to 60 percent of the AMI and 14 units restricted to households with incomes at 80 percent or less of the AMI. The project will provide literacy training, employment assistance, and financial management programs to the tenants.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 4,612 loans in the amount of \$505.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	211	34,434
Federal Housing Administration (FHA)	82	16,482
Chase Homebuyer Grant Loans	124	25,706
Homebuyer Education Grants	125	63
Home Lending SPCP	161	37,904
Community Lending Program (Correspondent SPCP)	43	9,662
Veteran's Administration (VA)	15	4,156
VA Purchase Closing Credit	3	589
Business Card SPCP	91	316
Business Banking SPCP	82	6,969
Paycheck Protection Program (PPP)	3,675	369,438
Total	4,612	505,719

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test conclusion for the state of Louisiana.

The bank made one CD loan totaling \$350,000 to a borrower in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$3.2 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Houma MSA, Lafayette CSA, Monroe CSA, Shreveport MSA, and non-MSA Louisiana AA was consistent with the bank's performance in the full-scope area. Performance in the Alexandria MSA, Baton Rouge MSA, and Lake Charles MSA was weaker than the bank's performance in the full-scope area due to lower levels of CD lending activities. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

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. Performance in the limited-scope AAs had a negative impact on the rating, while positive performance in the broader statewide or regional area partially offset this weaker performance.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, although not in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 8.4 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 34 grants and donations, totaling \$11.3 million to 20 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
New Orleans CSA	21	15,371	45	48,713	66	55.5	64,083	48.3	0	0
Limited-Scope										
Alexandria MSA	1	361	0	0	1	0.8	361	0.3	0	0
Baton Rouge MSA	6	5,805	9	6,617	15	12.6	12,422	9.4	0	0
Houma MSA	1	1,279	1	75	2	1.7	1,354	1.0	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lafayette CSA	3	1,967	2	50	5	4.2	2,017	1.5	0	0
Lake Charles MSA	0	0	2	403	2	1.7	403	0.3	0	0
Monroe CSA	1	1,311	1	50	2	1.7	1,361	1.0	0	0
Shreveport MSA	1	128	4	28,076	5	4.2	28,204	21.2	0	0
Non-MSA LA	1	1,547	0	0	1	0.8	1,547	1.2	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	10	862	10	8.4	862	0.7	0	0
Indirect Benefit	6	5,035	4	15,163	10	8.4	20,198	15.2	0	0
Total	41	32,803	78	100,008	119	100.0	132,811	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited good responsiveness to the credit and economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 45.8 percent of investments supported affordable housing, 35.5 percent funded community services to low- and moderate-income individuals, 15.0 percent supported revitalization and stabilization efforts, and 3.6 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$8.9 million that supported 131 affordable housing units. Additionally, the bank made five HTC investments totaling 4.6 million, and one NMTC investment totaling \$7.2 million.

Qualified investments made during the evaluation period include:

- Three HTC investments totaling \$1.9 million for the redevelopment of an old elementary school into a mixed-use facility that will include 25 units of affordable apartments for seniors with 60 percent or less of the AMI. The development supports a local government's plan that outlines the need for revitalization and stabilization strategies to eliminate blight and vacant properties, expand affordable housing, and develop mixed-use multi-family housing projects.
- Two grants totaling \$3.8 million to a small community development organization. Funding was used to help low-to-moderate-income individuals who currently work in childcare businesses or other low-wage jobs in the hospitality industry.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Shreveport MSA and non-MSA Louisiana was consistent than the bank's performance in the full-scope area. Performance in the Alexandria MSA, Baton Rouge MSA, Houma MSA, Lake Charles MSA, Lafayette CSA, and Monroe CSA was weaker than the bank's performance in the full-scope AA due to a lower level of CD investments. Performance in the limited-scope AAs had a negative impact on the Investment Test conclusion for the state of Louisiana.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas had a positive impact on the Investment Test conclusion for the state of Louisiana. The bank made 10 investments totaling \$862,020 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals, revitalization and stabilization efforts, and economic development.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$20.2 million of current- and prior-period in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 323 affordable units and NMTCs.

SERVICE TEST

The bank's performance under the Service Test in the state of Louisiana is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Louisiana.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New Orleans CSA was good.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
New Orleans CSA	34.9	32	31.7	3.1	25.0	25.0	46.9	0.0	8.8	25.6	31.4	32.8	1.3
Limited-Scope													
Alexandria MSA	1.9	4	4.0	0.0	25.0	50.0	25.0	0.0	5.3	21.2	35.6	37.7	0.3
Baton Rouge MSA	37.2	20	19.8	5.0	20.0	35.0	35.0	5.0	10.3	17.1	35.9	33.2	3.6
Houma MSA	3.2	5	5.0	20.0	20.0	40.0	20.0	0.0	3.9	15.2	47.8	30.8	2.4
Lafayette CSA	9.4	15	14.9	6.7	40.0	40.0	13.3	0.0	6.5	25.4	33.2	34.3	0.6
Lake Charles MSA	4.1	6	5.9	0.0	33.3	50.0	16.7	0.0	10.0	14.8	41.4	33.9	0.0

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Monroe CSA	3.7	8	7.9	12.5	37.5	25.0	25.0	0.0	16.2	15.7	26.8	40.1	1.2
Shreveport MSA	5.3	10	9.9	0.0	50.0	30.0	20.0	0.0	6.2	25.7	29.3	36.8	2.0
Non-MSA LA	0.3	1	1.0	0.0	0.0	0.0	100.0	0.0	0.0	2.6	31.7	65.7	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners further considered 13 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which seven were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the New Orleans CSA included three Community Branches, of which one was in a low-income geography and two were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 119 deposit-taking ATMs in the AA, of which 4.2 percent were in low-income geographies and 31.1 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies maintained consistent usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
New Orleans CSA	1	3	0	-1	-1	0	0
Limited-Scope							
Alexandria MSA	0	0	0	0	0	0	0
Baton Rouge MSA	2	7	0	-1	-2	-2	0
Houma MSA	0	2	0	0	-1	-1	0
Lafayette CSA	0	2	0	0	-2	0	0
Lake Charles MSA	0	3	0	-2	-1	0	0

Monroe CSA	0	0	0	0	0	0	0
Shreveport MSA	1	3	0	0	-1	-1	0
Non-MSA LA	0	0	0	0	0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							
<i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

To the extent changes have been made, 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 one branch in an upper-income geography. The bank closed three branches, one of which was in a moderate-income geography. The branch closures were due to reduced customer usage and proximity to other JPMCB branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 1:00 p.m. on Saturdays. There were 26 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the New Orleans CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 1,952 qualified CD service activities to 75 organizations, for a total of 5,040 hours. A majority of the bank's assistance was to nonprofit organizations providing technology resources, expertise, and skills to create solutions targeted to low- and moderate-income individuals and families. Leadership was evident by five bank employees spending 314 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with improving financial health in underserved populations.

Service activities during the evaluation period include:

- JPMCB provided technical assistance to an MDI. JPMCB's capacity building support helped the MDI better support small businesses and increase its mortgage lending capacity. JPMCB provided technical assistance to help expand a local redevelopment fund, which provided access to capital for entrepreneurs seeking to participate in public infrastructure projects.
- A JPMCB employee served on the board of a nonprofit affordable housing resource center. The organization provides courses on fair housing education, free legal services for victims of housing discrimination, policy advocacy, and foreclosure prevention counseling.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews, the bank's performance under the Service Test in the Alexandria MSA and Baton Rouge MSA was consistent with the bank's performance in the full-scope area. Performance in the Houma MSA, Lafayette CSA, and Monroe CSA was stronger than the bank's performance in the full-scope area due to higher branch distribution percentages in low-income geographies. Performance in the Lake Charles MSA, Shreveport MSA, and non-MSA Louisiana was weaker than the bank's performance in the full-scope area due to lower branch distribution percentage in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in limited-scope AAs did not impact the Service Test conclusion for the state of Louisiana.

State of Maine

CRA Rating for the State of Maine: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated good responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Maine

Examiners assessed performance in a single AA in the state of Maine rating area. This AA was comprised of a majority of the Portland-South Portland, ME (Portland) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Maine is JPMCB's 50th largest rating area. As of June 30, 2023, the bank had approximately \$96.9 million in deposits in the state of Maine rating area, of which approximately \$89.6 million represent retail branch deposits. As of December 31, 2023, the bank operated five branches and 15 deposit taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately 539 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 178 branches in the state rating area. JPMCB ranked 17th in deposit market share with 2.2 percent. Primary competitors include TD Bank, N.A. with 16.6 percent deposit market share, Bank of America with 13.3 percent, and Keystone National Association with 9.1 percent.

The Portland MSA AA consists of Cumberland and York counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 181 branches in the AA. JPMCB operated four branches in the AA and was ranked 17th in deposit market share with 0.5 percent. Primary competitors include TD Bank, N.A. with 16.2 percent deposit market share, Bank of America with 13.4

percent, and Key Bank, N.A. with 9.1 percent. As of December 31, 2023, the bank operated 15 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Portland MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Portland MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	108	3.7	22.2	51.9	20.4	1.9
Population by Geography	485,801	2.9	20.8	54.9	21.4	0.0
Housing Units by Geography	246,696	2.8	22.6	54.6	19.9	0.0
Owner-Occupied Units by Geography	139,164	1.0	16.1	58.7	24.1	0.0
Occupied Rental Units by Geography	60,098	8.1	35.5	43.3	13.1	0.0
Vacant Units by Geography	47,434	1.6	25.4	56.9	16.1	0.0
Businesses by Geography	41,258	2.7	26.0	48.9	22.4	0.0
Farms by Geography	1,410	1.1	15.0	60.1	23.8	0.0
Family Distribution by Income Level	125,214	20.3	17.8	21.8	40.2	0.0
Household Distribution by Income Level	199,262	23.8	16.1	18.0	42.1	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$74,701	Median Housing Value			\$252,845
			Median Gross Rent			\$950
			Families Below Poverty Level			7.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Portland MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	140	0.7	22.1	52.1	23.6	1.4
Population by Geography	515,041	0.4	19.9	51.7	27.9	0.0
Housing Units by Geography	256,905	0.4	22.3	51.8	25.5	0.0
Owner-Occupied Units by Geography	150,989	0.1	17.9	52.9	29.2	0.0
Occupied Rental Units by Geography	59,314	1.4	29.4	48.2	21.0	0.0
Vacant Units by Geography	46,602	0.1	27.9	52.6	19.4	0.0
Businesses by Geography	62,904	0.2	20.9	52.4	26.5	0.0
Farms by Geography	2,002	0.1	18.5	54.1	27.3	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Portland MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	128,822	18.1	18.1	23.7	40.1	0.0
Household Distribution by Income Level	210,303	23.4	16.2	18.8	41.6	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$89,988	Median Housing Value			\$301,003
			Median Gross Rent			\$1,125
			Families Below Poverty Level			4.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Portland MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Portland MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Portland MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$934 according to 2015 ACS data and \$1,125 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,494 according to 2015 ACS data and \$1,800 according to 2020 Census data. The monthly mortgage payment for the median home in the Portland MSA would be \$1,357 using 2015 ACS data and \$1,616 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 61 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Portland MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Portland MSA, 7.1 percent of families had incomes below the FPL according to the 2015 ACS and 4.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Portland MSA was 2.8 percent compared to the state of Maine at 3.4 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Portland economy was stagnated. Job growth was below that of the Northeast and the rest of the country, with employment in the outsized healthcare industry offset by factory job losses. The jobless rate fell below its pre-pandemic rate despite upward pressure from labor force gains. Portland had an above-average share of manufacturing employment and production was highly concentrated in shipbuilding due to Bath Iron Works. The company is one of only two that can build ships for the U.S. Navy. Employment at Bath Iron Works was expected to increase in the short term due to recent government contracts, however a large share of the company's workforce was at or near retirement age and the company was hiring workers with less experience, decreasing efficiency. Leisure/hospitality made up an above-average share of payrolls due to the large number of travelers attracted to Portland's coastline and unique dining scene.

Natural population loss has been a problem since 2016, with deaths exceeding births. Net migration has been positive in recent years, offsetting natural population decline. However, an above-average share of residents were ages 55 or older, exacerbating worker shortages. House prices in the Portland area had yet to endure a correction, and although growth has slowed, house price appreciation was well ahead of the U.S. rate. Single-family permits were on the rise. The area's strength's included coastal and urban amenities that attract tourists and vacation home buyers, well-educated work force with a high share of telecommuters, a large healthcare industry, and below-average employment volatility. Weaknesses included high business costs, unfavorable age structure, and reliance on non-resident spending.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing and community development. Contacts noted that many asylum seekers have settled in the Portland area, which has put further strain on an already challenged housing market in terms of affordability. The area also has a large elderly population. There has been an increase in homelessness as housing costs continue to increase and struggling families come to the Portland seeking assistance. There are a number of "working poor" families that are ineligible for housing subsidies and other support services because the FPL income designations are not suitably adjusted to the actual costs of living. There is a need for more living wage jobs as well as training programs that will allow individuals to obtain the skills necessary to obtain higher-wage positions. There is a need for affordable housing, including affordable workforce housing. Other needs identified include:

- Support to increase the number of mental health providers, particularly in rural areas
- Access to affordable and flexible childcare
- Funding to assist with utility payments for low-income households
- Housing rehab programs
- More emergency shelter beds for people facing homelessness

Scope of Evaluation in State of Maine

Examiners selected the Portland MSA for full-scope review. There were no other AAs within the state of Maine. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Portland MSA	1,259	5,233	117	1	6,610	100.0	100.0
Total	1,259	5,233	117	1	6,610	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Portland MSA	477,060	60,285	1,277	1,008	539,630	100.0	100.0
Total	477,060	60,285	1,277	1,008	539,630	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 17th among 22 depository financial institutions, placing it in the top 78 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 42nd among 377 home mortgage lenders in the AA, which placed it in the top 12 percent of lenders. The top three lenders were Bangor Savings Bank (8 percent), United Wholesale Mortgage (5.1 percent), and The Camden National Bank (3.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 73 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (22.0 percent), Capital One (9.3 percent), and Bank of America (6.8 percent).

In overall small loans to farms for 2022, the bank had a market share of 27.9 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 15 small farm lenders in the AA. The other top lenders were Capital One (16.4 percent), U.S. Bank (16.4 percent), and Bank of America (9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Maine 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of home mortgage loans in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the Maine 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies but was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of lending in low-income geographies.

Small Loans to Farms

Refer to Table S in the Maine 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Maine 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$1 million, which represented 10.9 percent of the allocated tier 1 capital. This loan was a PPP loan which supported revitalization and stabilization efforts to provide relief for an organization due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 60 loans in the amount of \$13.6 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	9	1,784
Federal Housing Administration (FHA)	1	156
Chase Homebuyer Grant Loans	20	6,677
Homebuyer Education Grants	2	1
Veteran's Administration (VA)	1	339
Paycheck Protection Program (PPP)	27	4,629
Total	60	13,586

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Maine is rated Outstanding. Performance in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 145.6 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Portland MSA	0	0	4	13,481	4	66.7	13,481	66.8	0	0
Broader Statewide/Regional Area										
Indirect Benefit	2	6,688	0	0	2	33.3	6,688	33.2	0	0
Total	2	6,688	4	13,481	6	100.0	20,169	100.0	0	0
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date. ** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing and revitalization/stabilization. By dollar volume, 66.7 percent of investments supported affordable housing and 33.3 percent supported revitalization and stabilization efforts.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$9 million that supported 45 affordable housing units. Additionally, the bank made three HTC investments totaling \$4.5 million.

Qualified investments made during the evaluation period include three HTC investments totaling \$4.5 million for the rehabilitation of a historic hospital building in a moderate-income geography into a largely residential building. The project aligns with the historic preservation program and a local government redevelopment plan. The project will include market rate apartments, commercial suites including a neighborhood café and medical clinic, and a self-storage facility.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test conclusion for the state of Maine. Because the bank was responsive to CD needs and opportunities in its AA, examiners considered two prior-period investments totaling \$6.72 million in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments were LIHTCs that supported 66 affordable housing units.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Portland MSA	100.0	5	100.0	0.0	0.0	80.0	20.0	0.0	0.4	19.9	51.7	28.0	0.0
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low- or moderate-income geographies. The Portland CSA branch distribution was impacted by the 2020 Census new income designations. Two moderate-income branches were reclassified, reducing the bank's moderate-income branches to zero and lowering the bank's moderate-income branch distribution. Examiners considered the three branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which one was within 1,000 feet of a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS, including ATMs, telephone banking, online banking, and mobile banking options. The bank had 15 deposit-taking ATMs in the AA, none of which were in low- or moderate-income geographies. Bank provided data that indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches				
			(+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Portland MSA	5	0	0	2	2	1	0
*The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and

opened five branches, of which two were in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Portland MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 261 qualified CD service activities to 18 organizations, for a total of 387 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by two bank employees spending 105 hours participating on boards and committees for three different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- JPMCB facilitated small business trainings to entrepreneurs and small businesses on the importance of capital. During the workshops, JPMCB experts covered how to increase cash flow and understand loans and credit options.
- JPMCB partnered with several CCAs to provide tailored credit counseling and debt education to 285 low- and moderate-income individuals.

State of Massachusetts

CRA Rating for the State of Massachusetts²³: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Massachusetts

Examiners assessed performance in three AAs in the state of Massachusetts rating area. These was comprised of a majority of the Springfield, MA (Springfield) MSA, the entire Pittsfield, MA (Pittsfield) MSA, and one county in the non-MSA Massachusetts AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The Pittsfield MSA and non-MSA Massachusetts AAs was delineated as AA due to the presence of deposit-taking ATMs only. The bank exited the Pittsfield MSA in October 2023 and allocated all of the bank's deposits to the Springfield MSA.

The state of Massachusetts in JPMCB's 56th largest rating area. As of June 30, 2023, the bank had approximately \$2.8 million in deposits in the state of Massachusetts rating area, all of which represent retail branch deposits. As of December 31, 2023, the bank operated three branches and eight deposit taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$634.4 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 29 banks operating 230 branches in the state rating area. JPMCB ranked 29th in deposit market share with .01 percent. Primary competitors include TD Bank National Association with 11.9 percent deposit market share, Peoples Bank with 11 percent, and Berkshire Bank with 10.8 percent.

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.

Springfield MSA

The Springfield MSA AA consists of Hampden and Hampshire counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 19 banks operating 167 branches in the AA. JPMCB operated three branches in the AA and was ranked 19th in deposit market share with less than 0.1 percent. Primary competitors include Peoplesbank with 14.4 percent deposit market share, Bank of America with 13.3 percent, and TD Bank, N.A. with 12.6 percent. As of December 31, 2023, the bank operated seven deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Springfield MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Springfield MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	17.3	15.8	29.5	34.5	2.9
Population by Geography	628,800	14.3	15.3	31.0	36.5	2.9
Housing Units by Geography	254,960	14.1	16.0	33.7	36.0	0.1
Owner-Occupied Units by Geography	147,690	4.7	12.4	35.2	47.6	0.0
Occupied Rental Units by Geography	87,841	28.4	21.1	32.0	18.3	0.3
Vacant Units by Geography	19,429	20.9	20.7	30.6	27.4	0.4
Businesses by Geography	45,486	14.3	15.2	28.8	41.1	0.8
Farms by Geography	1,406	3.1	5.9	31.7	59.2	0.0
Family Distribution by Income Level	149,875	24.7	15.7	17.9	41.8	0.0
Household Distribution by Income Level	235,531	27.1	14.5	15.5	42.9	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,203	Median Housing Value			\$209,221
			Median Gross Rent			\$856
			Families Below Poverty Level			12.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Springfield MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	12.2	21.6	31.7	30.9	3.6
Population by Geography	628,133	9.1	21.9	31.2	34.8	3.0
Housing Units by Geography	257,827	8.9	23.3	33.0	34.5	0.3

Table A – Demographic Information of the Assessment Area Assessment Area: Springfield MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	151,712	2.3	16.0	37.0	44.7	0.0
Occupied Rental Units by Geography	88,387	19.1	34.9	26.1	19.2	0.7
Vacant Units by Geography	17,728	14.3	27.7	33.3	23.6	1.1
Businesses by Geography	53,775	10.0	21.6	28.5	38.8	1.1
Farms by Geography	1,626	2.0	9.7	34.7	53.4	0.2
Family Distribution by Income Level	151,099	24.1	16.2	18.2	41.5	0.0
Household Distribution by Income Level	240,099	26.2	15.2	16.1	42.5	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$79,907	Median Housing Value			\$229,947
			Median Gross Rent			\$943
			Families Below Poverty Level			10.1%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Springfield MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Springfield MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Springfield MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$840 according to 2015 ACS data and \$999 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,344 according to 2015 ACS data and \$1,598 according to 2020 Census data. The monthly mortgage payment for the median home in the Springfield MSA would be \$1,123 using 2015 ACS data and \$1,234 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 46.6 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Springfield MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Springfield MSA, 12 percent of families had incomes below the FPL according to the 2015 ACS and 10.1 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Springfield MSA was 3.9 percent and the state of Massachusetts was 3.5 percent compared to the national unemployment rate of 3.5 percent.

Economic Data

Springfield's economy was performing on par with the slow-growing Northeast but was well behind the U.S. As of October, employment was slightly above its pre-pandemic level. While similar to the region, it was much slower than the pace of job creation nationally since the start of the pandemic. In recent months, tepid growth in Springfield's main drivers, healthcare and government, and losses in finance, professional/business services, and manufacturing kept job gains a step behind those of the nation. Springfield's reliance on healthcare employment was among the country's highest because its providers cater to an older than average population and served patients throughout western Massachusetts. The unemployment rate was lower than before the pandemic, but this was partly due to a sustained labor force contraction since 2020. The area's population declined in six of the last eight years. House prices have risen at an above-average pace in 2023 but are not as far above their early-2020 level as nationally. The area's strengths included affordable housing for New England, stability from a large healthcare presence, and below average employment volatility. Weaknesses included underrepresentation in high tech, persistent out-migration of skilled youth, and low labor force participation.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on small business, affordable housing and community development. Contacts noted that a high percentage of people in Hampden and Hampshire Counties live in poverty and are struggling. Springfield and Holyoke, which are in Hampden County, have many extremely low-income households that struggle with high housing costs in relation to their income. Many households have issues with both housing insecurity and food insecurity. A large percentage of rental units in Springfield are subsidized. Housing stock is old and has significant deferred maintenance. There is a need for low-cost funding to homeowners for rehab assistance. Contacts noted that many low-income households do not have a banking relationship and that area financial institutions should consider partnering with local community organizations to help reach these individuals. Many local businesses are having difficulty attracting and retaining qualified skilled workers, which can hinder economic growth in the area. There is a need for workforce development training to help create a pool of qualified workers. The area has seen an uptick in the trucking sector due to a new Amazon facility. Newer and start-up business have difficulty accessing capital. There is a need for working capital loans for small businesses. Other needs identified include:

- Support for neighborhood revitalization efforts
- Safe, decent, and affordable rental housing
- Support for afterschool and youth programs
- Rehabilitation of foreclosed and vacant properties to reduce blight
- Small business lending programs that support job creation and business growth

Scope of Evaluation in State of Massachusetts

Examiners selected the Springfield MSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Massachusetts. The MSA accounts for

100 percent of adjusted deposits and 73.2 percent of lending in the state. The Pittsfield MSA and the non-MSA Massachusetts AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Pittsfield MSA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for that AA.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Massachusetts AA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending. There were no low-income geographies in the non-MSA Massachusetts AA. All geographic conclusions were based solely on performance in moderate-income geographies.

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 High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Springfield MSA	786	4,477	75	1	5,339	73.2	100.00
Limited-Scope							
Pittsfield MSA	210	1,243	44	0	1,497	20.5	N/A
Non-MSA MA	152	283	19	0	454	6.2	N/A
Total	1,148	6,003	138	1	7,290	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Springfield MSA	192,154	49,674	811	2650	245,289	38.7	100.00

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Limited-Scope							
Pittsfield MSA	79,307	14,244	440	0	93,991	14.8	N/A
Non-MSA MA	290,987	3,935	181	0	295,103	46.5	N/A
Total	562,448	67,853	1,432	2,650	634,383	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.1 percent. The bank ranked 19th among 19 depository financial institutions, placing it in the top 100 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 59th among 367 home mortgage lenders in the AA, which placed it in the top 17 percent of lenders. The top three lenders were Citizen's Bank (5.7 percent), Peoplesbank (5.5 percent), and Florence Bank (4.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 85 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (23.6 percent), Citibank (9.9 percent), and Capital One (8.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 35.6 percent based on the number of small loans to farms originated or purchased. The bank ranked first among eight small farm lenders in the AA. The other top lenders were U.S. Bank (21.8 percent), John Deere Financial (14.9 percent), and Capital One (12.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to the bank not originating or purchasing and small loans to farms in either low- or moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but was near to the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of

CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$2.6 million, which represented 928.9 percent of the allocated tier 1 capital. This loan was a PPP loan that supported revitalization and stabilization efforts during the COVID-19 pandemic.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 46 loans in the amount of \$8.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	6	1,321
Federal Housing Administration (FHA)	1	245
Chase Homebuyer Grant Loans	2	439
Homebuyer Education Grants	5	3
Home Lending SPCP	1	213
Community Lending Program (Correspondent SPCP)	7	1,726
Business Card SPCP	9	36
Paycheck Protection Program (PPP)	15	4,760
Total	46	8,743

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA and the non-MSA Massachusetts AA was weaker than the bank's performance in the full-scope area due to lower geographic distribution, lower borrower distributions, and/or no CD lending activity. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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 High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the rating, while investments in the broader statewide or regional area supported the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, though not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and

prior-period investments represented 1,301.1 percent of allocated tier 1 capital. The bank made seven current- and prior-period investments totaling \$3.7 million during the evaluation period.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Springfield MSA	4	2,053	3	1,659	7	50.0	3,712	23.4	0	0
Limited-Scope										
Pittsfield MSA	0	0	0	0	0	0	0	0	0	0
Non-MSA MA	0	0	0	0	0	0	0	0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	3	1,429	3	21.4	1,429	9.0	0	0
Indirect Benefit	4	10,715	0	0	4	28.6	10,715	67.6	0	0
Total	8	12,767	6	3,088	14	100.0	15,856	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with all investments supporting affordable housing. However, 44.7 percent were MBS.

The bank did not use innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made three MBS investments totaling \$1.7 million to support the financing of properties consisting of one to four residential units. These investments supported six affordable units.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews, the bank's performance under the Investment Test in the Pittsfield MSA and non-MSA Massachusetts AA was weaker than the bank's performance in the full-scope AA due to the bank not making any investments in these AA. Performance in limited-scope areas had a neutral impact on the overall Investment Test conclusion in the state of Massachusetts.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test conclusion for the state of Massachusetts. The bank made three grants totaling \$1.4 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$10.7 million of prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 300 affordable units.

SERVICE TEST

The bank's performance under the Service Test in the state of Massachusetts is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Massachusetts.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Springfield MSA	100.0	3	100.0	33.3	33.3	0.0	33.3	0.0	9.1	21.9	31.2	34.8	3.0
Limited-Scope													
Pittsfield MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	2.6	19.5	52.8	25.0	0.0
Non-MSA MA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	23.4	76.6	0.0	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank's distribution of branches in low- and moderate- income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had seven deposit-taking ATMs in the AA, of which 28.6 percent were in low-income geographies and 42.9 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Springfield MSA	3	0	1	1	0	1	0
Limited-Scope							
Pittsfield MSA	0	0	0	0	0	0	0
Non-MSA MA	0	0	0	0	0	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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. During the evaluation period, the bank entered the AA and opened three branches, of which one was in a low-income geography, and another was in a moderate-income geography. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenience the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branches locations in the AA. Business hours were Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Springfield MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 391 qualified CD service activities to 17 organizations, for a total of 876 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy and affordable housing for the underserved populations.

JPMCB partnered with several CCAs and dedicated 538 hours to provide financial literacy education and technical assistance to a nonprofit organization. Services include credit counseling, debt consolidation, bankruptcy counseling services, student loan counseling and educational and literacy programs, targeting underserved populations.

The bank provided homebuyer education seminars to 46 individuals, in partnership with a HUD-approved non-profit housing counseling agency or an organization. Customers completed a financial education course either online or in person, providing them with the tools needed to be financially fit for homeownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews bank's performance under the Service Test in the Pittsfield, MA MSA and the non-MSA Massachusetts AA was weaker than the bank's performance in the full-scope area due to the bank only having deposit taking ATMs in these AA. The bank's performance in limited-scope AAs did not impact the Service Test conclusion for the state of Massachusetts.

State of Michigan

CRA Rating for the State of Michigan: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall adequate level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs. Performance in the limited-scope AAs and investments in the broader statewide or regional areas positively impacted the overall Investment Test conclusion.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Michigan

Examiners assessed performance in seven AAs in the state of Michigan rating area. These were comprised of a majority of the Detroit-Warren-Ann Arbor, MI (Detroit) CSA and Grand Rapids-Kentwood-Muskegon, MI (Grand Rapids) CSA, the entire Kalamazoo-Portage, MI (Kalamazoo) MSA, Lansing-East Lansing, MI (Lansing) MSA, Niles, MI (Niles) MSA, and Saginaw, MI (Saginaw) MSA, and six counties in the non-MSA Michigan AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Michigan is JPMCB's 6th largest rating area. As of June 30, 2023, the bank had approximately \$68.5 billion in deposits in the state of Michigan rating area, of which approximately \$63 billion represent retail branch deposits. As of December 31, 2023, the bank operated 177 branches and 418 deposit taking ATMs in the rating area, representing 3.6 percent of total branches and 2.7 percent of total ATMs. The bank originated and purchased approximately \$11.5 billion in loans, or 1.8 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 71 banks operating 1,430 branches in the state rating area. JPMCB ranked first in deposit market share with 26.5 percent. Primary competitors include Comerica Bank with 12.5 percent deposit market share, Bank of America with 11.9 percent, and The Huntington Bank with 11.7 percent.

Detroit CSA

The Detroit CSA AA consists of Genesee, Lapeer, Livingston, Macomb, Oakland, St. Clair, Washtenaw, and Wayne counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 41 banks operating 900 branches in the AA. JPMCB operated 130 branches in the AA and was ranked first in deposit market share with 31 percent. Primary competitors include Comerica Bank with 15.4 percent deposit market share, Bank of America with 14.5 percent, and The Huntington National Bank with 9.9 percent. As of December 31, 2023, the bank operated 340 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Detroit CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Detroit CSA 2020-2021						
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	420,390	8.2	19.8	32.2	38.8	1.0
Farms by Geography	9,905	4.8	17.0	43.8	34.1	0.3
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				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Detroit CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,597	9.8	24.9	30.5	28.4	6.4
Population by Geography	5,170,510	8.0	24.1	33.2	33.1	1.5

Table A – Demographic Information of the Assessment Area Assessment Area: Detroit CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Housing Units by Geography	2,255,300	9.4	25.9	32.7	30.6	1.4
Owner-Occupied Units by Geography	1,406,419	4.7	20.9	35.7	38.1	0.6
Occupied Rental Units by Geography	633,603	16.4	33.2	29.4	18.4	2.6
Vacant Units by Geography	215,278	19.9	37.1	22.7	16.9	3.4
Businesses by Geography	460,654	6.7	20.4	31.2	39.1	2.6
Farms by Geography	10,943	4.3	18.4	42.4	33.9	0.9
Family Distribution by Income Level	1,273,159	21.7	17.2	20.1	40.9	0.0
Household Distribution by Income Level	2,040,022	24.8	15.8	17.3	42.1	0.0
Median Family Income MSA - 11460 Ann Arbor, MI MSA		\$105,224	Median Housing Value			\$181,623
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI		\$63,896	Median Gross Rent			\$984
Median Family Income MSA - 22420 Flint, MI MSA		\$62,084	Families Below Poverty Level			9.9%
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI		\$92,419				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Detroit CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Detroit CSA, some low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Detroit CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$659 to \$1,092 according to 2015 ACS data and from \$776 to \$1,315 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,055 to \$1,746 according to 2015 ACS data and ranging from \$1,242 to \$2,104 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Detroit CSA would be \$702 using 2015 ACS data and \$975 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 40.4 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Detroit MD. Increases ranged from 36.7 percent to 42.9 percent for other components of the Detroit CSA. This acceleration in home prices creates new affordability concerns in the Detroit CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Detroit CSA, 12.8 percent of families had incomes below the FPL according to the 2015 ACS and 9.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Detroit CSA was 3.3 percent compared to both the state of Michigan and the national unemployment rate of 3.5 percent.

Economic Data

The Detroit area's strengths included a concentration of auto industry headquarters, production, research and development, high housing affordability, and being well-positioned for growth in green and advanced manufacturing. However, the area struggled with below average quality of life, including a high crime rate and eroding infrastructure, a challenging fiscal situation in the city of Detroit, and persistent out-migration. Economic recovery in the area was inconsistent. The share of industries adding jobs fell and most industries, apart from finance and logistics, have struggled to maintain momentum. Manufacturing accounts for an above-average share of jobs and nearly two-thirds of durable manufacturing payrolls were in transportation equipment production. The area was particularly vulnerable to global supply chain issues brought on by the COVID-19 pandemic, including the persistent chip shortage which impacted vehicle production. The healthcare industry was struggling largely due to labor shortages as nurses and other healthcare workers are quitting at record high rates. However, the demand for healthcare services continued to increase with the area having a larger than average population of residents 65 and older.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing and economic mobility and economic development/small business. Contacts noted that many Detroit neighborhoods are underinvested. Homes do not appraise well resulting in high LTV loans that increase loan costs for borrowers. Contacts also noted that a big issue for many low- and moderate-income residents is transferring home titles from a deceased family member to another relative. Many residents continue to live in homes that were owned by deceased relatives but do not have title to the property. The lack of title precludes these individuals from qualifying for programs designed to assist low- and moderate-income homeowners. Credit and community developments needs in the area including:

- Access to safe affordable housing
- Housing rehab loans
- Access to capital for small business contractors
- Small business loans
- Down-payment assistance programs
- Credit counseling
- Funding for nonprofit legal aid offices to assist with title issues

The area is served by several nonprofit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in State of Michigan

Examiners selected the Detroit CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Michigan. The CSA accounts for 90.8 percent of the bank's adjusted deposits and 75.9 percent of lending in the state. The Grand Rapids, Kalamazoo, Lansing, Niles, and Saginaw MSAs and the non-MSA Michigan AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Kalamazoo and Saginaw MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for those AAs.

There were no low-income geographies in the non-MSA Michigan AA. All geographic conclusions were based solely on performance in moderate-income geographies.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Detroit CSA	25,645	88,490	583	182	114,900	75.9	90.8
Limited-Scope							
Grand Rapids CSA	4,099	15,199	302	29	19,629	13.0	4.4
Kalamazoo MSA	512	2,085	42	6	2,645	1.7	0.4
Lansing MSA	1,105	3,653	108	15	4,881	3.2	1.3
Niles MSA	611	1,790	71	0	2,472	1.6	0.5
Saginaw MSA	230	1,322	33	0	1,585	1.0	0.6
Non-MSA MI	976	4,071	170	4	5,221	3.4	1.9

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Broader Statewide/Regional Area							
Direct Benefit				1	1	0.0	
Indirect Benefit				12	12	0.0	
Total	33,178	116,610	1,309	249	151,346	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Detroit CSA	6,117,723	2,192,276	7,874	894,699	9,212,572	79.6	90.8
Limited-Scope							
Grand Rapids CSA	889,877	265,637	3,739	59,180	1,218,433	10.5	4.4
Kalamazoo MSA	114,953	34,478	474	11,612	161,517	1.4	0.4
Lansing MSA	192,492	67,351	1,201	6,471	267,515	2.3	1.3
Niles MSA	215,849	34,663	613	0	251,125	2.2	0.5
Saginaw MSA	32,235	35,638	448	0	68,321	0.6	0.6
Non-MSA MI	285,241	87,729	2,909	1,394	377,273	3.3	1.9
Broader Statewide/Regional Area							
Direct Benefit				250	250	0.0	
Indirect Benefit				17,205	17,205	0.1	
Total	7,848,370	2,717,772	17,258	990,811	11,574,211	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 31 percent. The bank ranked first among 41 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 2.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 684 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders were Rocket Mortgage (11.5 percent), United Wholesale Mortgage (9.9 percent), and The Huntington National Bank (4.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 179 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (27 percent), Citibank (7.5 percent), and Capital One (7.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 40.3 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 23 small farm lenders in the AA. The other top lenders were John Deere Financial (17.1 percent), U.S. Bank (13.4 percent), and Capital One (7.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was near to the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies but was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of small loans to farms in low-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than with the performance in 2022 through 2023 due to a lower percentage of lending to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Michigan 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 182 CD loans totaling \$894.7 million, which represented 15.1 percent of the allocated tier 1 capital. By dollar volume, 56.3 percent of these loans funded community services targeted to low- and moderate-income individuals, 37.3 percent funded revitalization and stabilization efforts, 6.3 percent funded affordable housing, and 0.1 percent funded economic development. Of the total CD loans, the bank made 137 PPP loans totaling \$160.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- An \$84.9 million construction loan for the redevelopment of an industrial brownfield site in a moderate-income geography and an Opportunity Zone. This project is funded in conjunction with city and state government plans to expand business opportunities within low-income communities and underutilized business areas. This project is expected to create over 300 new permanent jobs once complete.
- A \$52 million construction loan for the development of student housing in a low-income geography. The project consists of 218 apartments designed primarily for young professionals, students, faculty and visiting professors. The project supports a government plan that encourages new developments that will revitalize and strengthen the area and economy.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 17,682 loans in the amount of \$1.9 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	1,386	192,192
Federal Housing Administration (FHA)	217	33,949
Chase Homebuyer Grant Loans	748	127,774
Homebuyer Education Grants	762	381
Home Lending SPCP	391	59,963
Community Lending Program (Correspondent SPCP)	28	5,586
Veteran's Administration (VA)	54	13,178
VA Purchase Closing Credit	26	6,291
Business Card SPCP	130	505
Business Banking SPCP	73	6,298
Paycheck Protection Program (PPP)	13,867	1,503,430
Total	17,682	1,949,547

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test conclusion for the state of Michigan.

The bank made one CD loan totaling \$249,597 to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. The loan promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$17.2 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Grand Rapids CSA, Kalamazoo MSA, and Lansing MSA was consistent with the bank's performance in the full-scope area. Performance in the Niles MSA, Saginaw MSA, and non-MSA Michigan AA was weaker than the bank's performance in the full-scope area due to lower levels of CD lending. Performance in the limited-scope AAs had a neutral impact on the overall State rating.

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 High Satisfactory. Performance in the limited-scope AAs and broader statewide or regional areas had a positive impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had 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. The dollar volume of current- and prior-period investments represented 5.3 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 74 grants and donations, totaling \$19.8 million to 39 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Detroit CSA	57	61,613	176	250,658	233	68.93	312,271	59.8	0	0
Limited-Scope										
Grand Rapid CSA	16	26,911	10	22,022	26	7.7	48,933	9.4	0	0
Kalamazoo MSA	5	15,028	5	15,816	10	2.7	30,844	5.9	0	0
Lansing MSA	4	9,305	6	40,968	10	2.7	50,273	9.6	0	0
Niles MSA	0	0	3	24,069	3	0.9	24,069	4.6	0	0
Saginaw MSA	0	0	2	2,418	2	0.6	2,418	0.5	0	0
Non-MSA MI	7	2,337	2	2,901	9	2.7	5,237	1.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	1	3,097	7	2,716	8	2.4	5,813	1.1	0	0
Indirect Benefit	22	9,604	15	32,796	37	11.0	42,400	8.1	0	0
Total	112	127,895	226	394,364	338	100.0	522,258	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 78.9 percent of investments supported affordable housing, 10.1 percent supported revitalization and stabilization efforts, 10 percent funded community services to low- and moderate-income individuals, and one percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 28 LIHTC investments totaling \$139.5 million that supported 2,878 affordable housing units. Additionally, the bank made seven NMTC investments totaling \$28.1 million.

Qualified investments made during the evaluation period include:

- An \$18.7 million LIHTC investment for the rehabilitation of a multi-family housing property in the AA. The property consisted of 180 units and served families earning 60 percent or less of the AMI.
- Four investments totaling \$18 million to a local CDFI that supports economic and community development in underserved communities. The proceeds were used to finance new, high quality residential, commercial, and retail development, as well as provide small and medium sized businesses with the capital needed to grow and expand in the bank's AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the non-MSA Michigan AA was consistent with the bank's performance in the full-scope area. Performance in the Grand Rapids CSA, Kalamazoo MSA, Lansing MSA, Niles MSA, and Saginaw MSAs was stronger due to higher levels of qualified investments. Performance overall in the limited-scope areas had a positive impact on the overall Investment Test conclusion for the state of Michigan.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas had a positive impact on the Investment Test conclusion for the state of Michigan. The bank made seven investments totaling \$5.8 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$42.4 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 2,305 affordable housing units and NMTCs.

SERVICE TEST

The bank's performance under the Service Test in the state of Michigan is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Michigan.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Detroit CSA	90.8	130	73.4	7.7	18.5	31.5	39.2	3.1	8.0	24.1	33.2	33.1	1.5
Limited-Scope													
Grand Rapids CSA	4.4	24	13.6	0.0	16.7	50.0	29.2	4.2	5.2	19.9	46.7	27.5	0.8
Kalamazoo MSA	0.4	2	1.1	0.0	0.0	50.0	50.0	0.0	6.3	21.5	37.6	33.3	1.3
Lansing MSA	1.3	7	4.0	0.0	28.6	28.6	28.6	14.3	3.3	18.1	47.9	26.1	4.6
Niles MSA	0.5	3	1.7	33.3	0.0	33.3	33.3	0.0	9.1	15.6	42.8	31.5	1.1
Saginaw MSA	0.6	3	1.7	0.0	66.7	0.0	33.3	0.0	5.2	25.9	31.5	37.5	0.0
Non-MSA MI	1.9	8	4.5	0.0	0.0	87.5	12.5	0.0	0.0	12.5	53.3	34.2	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies approximated and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 36 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 17 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Detroit CSA included four Community Branches, of which two were in low-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 340 deposit-taking ATMs in the AA, of which 9.7 percent were in low-income geographies and 16.5 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Detroit CSA	2	23	-3	-1	-8	-9	0
Limited-Scope							
Grand Rapids CSA	1	4	0	0	-2	-1	0
Kalamazoo MSA	0	1	0	-1	0	0	0
Lansing MSA	0	0	0	0	0	0	0

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Niles MSA	0	1	0	0	0	-1	0
Saginaw MSA	0	2	0	0	0	-2	0
Non-MSA MI	0	2	0	0	-1	-1	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							
<i>* The NA category consists of geographies that have not been assigned an income classification.</i>							

To the extent changes have been made, the bank's opening and closing of branches generally 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 two branches, of which one was in a low-income geography, and none were in moderate-income geographies. The bank closed 23 branches, of which four were in low-income geographies and one was in a moderate-income geography. The branch closures were due to reduced customer usage and proximity to other JPMCB branches.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 or 2:00 p.m. on Saturday. There were 103 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Detroit CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 5,368 qualified CD service activities to 94 organizations, for a total of 9,517 hours. A majority of the bank's assistance was to organizations providing financial capability training targeted to low-income and moderate-income individuals and families. Leadership was evident by eight bank employees spending 674 hours participating on boards and committees for eight different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with improving financial health for underserved populations.

Service activities during the evaluation period include:

- JPMCB partnered with a development coalition to provide financial capability and literacy education for citizens re-entering society after incarceration. The program provided returning citizens with the tools to build financial skills and increase the likelihood of a successful transition and better positioned them for employment.

- JPMCB partnered with several nonprofits to provide homeownership workshops to 762 participants. Participants learned about the homebuying process and down payment assistance programs available to low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews, the bank's performance under the Service Test in the Saginaw MSA was consistent with the bank's performance in the full-scope area. Performance in the Grand Rapids CSA, Kalamazoo MSA, Lansing MSA, Niles MSA, and non-MSA Michigan AA was weaker than the bank's performance in the full-scope area due to lower branch distribution percentages both in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Michigan.

State of Minnesota

CRA Rating for the State of Minnesota: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Minnesota

Examiners assessed performance in a single AA in the state of Minnesota rating area. This AA was comprised of a portion of the Minneapolis-St. Paul, MN-WI (Minneapolis) CSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Minnesota is JPMCB's 32nd largest rating area. As of June 30, 2023, the bank had approximately \$676.9 million in deposits in the state of Minnesota rating area, of which approximately \$643.1 million represent retail branch deposits. As of December 31, 2023, the bank operated 31 branches and 90 deposit taking ATMs in the rating area, representing 0.6 percent of total branches and 0.6 percent of total ATMs. The bank originated and purchased approximately \$4.2 billion in loans, or 0.7 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 129 banks operating 684 branches in the state rating area. JPMCB ranked 24th in deposit market share with 0.2 percent. Primary competitors include U.S. Bank with 40 percent deposit market share, Wells Fargo Bank with 21 percent and Ameriprise Bank, FSB with 8 percent.

The Minneapolis CSA AA consists of Anoka, Benton, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Stearns, and Washington counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 125 banks operating 631 branches in the AA. JPMCB operated 31 branches in the AA and was ranked 24th in deposit market share with 0.3 percent. Primary competitors include U.S.

Bank with 40.9 percent deposit market share, Wells Fargo Bank with 21.2 percent, and Ameriprise Bank, FSB with 9.1 percent. As of December 31, 2023, the bank operated 90 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Minneapolis CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	753	7.2	21.5	43.7	26.7	0.9
Population by Geography	3,234,331	5.9	19.0	44.9	29.9	0.3
Housing Units by Geography	1,318,488	5.5	19.8	45.9	28.5	0.3
Owner-Occupied Units by Geography	861,179	2.2	14.8	48.3	34.7	0.1
Occupied Rental Units by Geography	392,446	12.3	30.2	40.8	15.9	0.8
Vacant Units by Geography	64,863	8.9	22.6	45.9	21.8	0.7
Businesses by Geography	353,285	5.0	17.0	44.3	33.4	0.3
Farms by Geography	8,664	1.8	10.6	56.2	31.4	0.0
Family Distribution by Income Level	801,526	20.3	17.1	21.9	40.7	0.0
Household Distribution by Income Level	1,253,625	23.7	16.1	18.4	41.8	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$84,589	Median Housing Value			\$227,370
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$69,359	Median Gross Rent			\$954
			Families Below Poverty Level			7.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	850	5.9	21.4	43.4	27.9	1.4
Population by Geography	3,459,958	5.3	20.3	44.3	29.2	0.9
Housing Units by Geography	1,369,240	5.0	20.7	45.0	28.6	0.7
Owner-Occupied Units by Geography	905,073	2.4	16.5	48.1	33.0	0.1
Occupied Rental Units by Geography	404,532	10.6	30.3	38.4	18.8	1.9
Vacant Units by Geography	59,635	7.6	20.8	43.1	27.5	1.1
Businesses by Geography	397,292	4.0	17.7	42.3	35.1	0.9

Table A – Demographic Information of the Assessment Area Assessment Area: Minneapolis CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Farms by Geography	9,853	1.7	12.4	52.7	33.0	0.2
Family Distribution by Income Level	826,596	19.5	17.8	22.5	40.1	0.0
Household Distribution by Income Level	1,309,605	23.1	16.7	18.8	41.3	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$103,977	Median Housing Value			\$284,338
Median Family Income MSA - 41060 St. Cloud, MN MSA		\$80,403	Median Gross Rent			\$1,146
			Families Below Poverty Level			5.3%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Minneapolis CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Minneapolis CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Minneapolis CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$867 to \$1,057 according to 2015 ACS data and from \$1,005 to \$1,300 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,387 to \$1,692 according to 2015 ACS data and ranging from \$1,608 to \$2,080 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Minneapolis CSA would be \$1,221 using 2015 ACS data and \$1,526 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 29.9 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Minneapolis MSA and by 41.7 percent in the St. Cloud MSA. This acceleration in home prices creates new affordability concerns in the Minneapolis CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Minneapolis CSA, 7.1 percent of families had incomes below the FPL according to the 2015 ACS and 5.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Minneapolis CSA was 2.4 percent compared to the state of Minnesota at 2.6 percent and the national unemployment rate of 3.5 percent.

Economic Data

Minneapolis-St. Paul-Bloomington, MN-WI (Minneapolis) MSA

The Minneapolis economy is one of just three among the nation's 25 most populous for which payrolls have yet to return to their pre-pandemic peak. Weakness was concentrated in financial services and manufacturing. The unemployment rate was starting to increase even as the labor force has trended downward, and, while joblessness remained below average. This adds up to a decline in household employment. The area's strengths included the presence of major research institutions and corporate headquarters that foster innovation, a highly educated workforce, healthy consumer balance sheets, and positive population trends. Weaknesses included a cold climate, weakening migration trends, a relatively high tax burden for businesses, and an outsized concentration of industries that are sensitive to interest rate shocks.

St. Cloud, MN (St. Cloud) MSA

St. Cloud's economy was showing signs of gradual recovery. Recent payroll growth was driven primarily by retail, healthcare, and the public sector. The labor market was tight; however, the working-age population was growing slowly, and rising mortgage rates were creating challenges for homebuilders. St. Cloud's manufacturing landscape is diverse, focusing on food, fabricated metals, and transportation equipment. St. Cloud State University (SCSU) has rehired support staff due to more in-person learning, budget, and enrollment challenges persist. SCSU saw a decline in enrollment over the past six years, partly due to a shrinking pool of high school graduates in Minnesota. Healthcare continued to play a crucial role in St. Cloud's economy. Although hiring remains a challenge due to worker shortages, the healthcare industry nearly returned to its pre-pandemic payroll levels, outpacing regional averages.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on economic development, small business, affordable housing and workforce development. One of the contacts included a listening session with representatives of several housing focused organizations. Contacts noted that many small businesses are struggling to find workers. The area has a rapidly growing migrant population in need of support and services. While the overall unemployment rate is low, many low-income residents located in the inner-city face challenges accessing employment. North Minneapolis is an employment desert, so residents need access to transportation to obtain higher paying employment opportunities. The area needs Sharia-compliant lenders that provide real estate financing to Islamic organizations and businesses. Other needs identified include:

- Access to capital for small businesses
- Affordable rental housing
- Downpayment assistance programs for first time homebuyers
- Loan products that utilize alternative credit underwriting
- Financial education for small businesses

Scope of Evaluation in State of Minnesota

Examiners selected the Minneapolis CSA for full-scope review. There were no other AAs within the state of Minnesota. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Minneapolis CSA	7,783	27,708	368	170	36,029	100.0	100.0
Total	7,783	27,708	368	170	36,029	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Minneapolis CSA	3,528,094	320,963	3,964	381,262	4,234,283	100.0	100.0
Total	3,528,094	320,963	3,964	381,262	4,234,283	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.3 percent. The bank ranked 24th among 125 depository financial institutions, placing it in the top 20 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 40th among 639 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were U.S. Bank (6.3 percent), Bell Bank (6 percent), and Trustone Financial Credit Union (5.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 146 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (24 percent), U.S. Bank (21 percent), and Capital One (9.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 15.1 percent based on the number of small loans to farms originated or purchased. The bank ranked third among 29 small farm lenders in the AA, which placed it in the top 11 percent of lenders. The other top lenders were John Deere Financial (22.6 percent), U.S. Bank (20.5 percent), and Capital One (7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in low and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower percentage of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Minnesota 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 170 CD loans totaling \$381.3 million, which represented 573.4 percent of the allocated tier 1 capital. By dollar volume, 96.9 percent of these loans funded affordable housing, 2.8 percent funded revitalization and stabilization efforts, and 0.3 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made seven PPP loans totaling \$11.9 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$20.3 million construction loan to finance the construction of 143 senior residential apartment units. The project consists of 114 units restricted to households earning 60 percent or less of the AMI.
- A \$10.9 million loan to purchase and preserve an affordable multifamily property located in a moderate-income geography. The property is comprised of 115 units, of which 108 units are affordable to low- and moderate-income households.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 638 loans in the amount of \$396.6 million were funded under the

following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	155	29,760
Federal Housing Administration (FHA)	17	3,590
Chase Homebuyer Grant Loans	104	25,814
Homebuyer Education Grants	54	27
Home Lending SPCP	6	1,391
Community Lending Program (Correspondent SPCP)	13	2,922
Veteran's Administration (VA)	7	3,380
VA Purchase Closing Credit	3	1,189
Business Card SPCP	5	18
Paycheck Protection Program (PPP)	155	101,700
Affordable Housing Preservation Program	119	226,809
Total	638	396,600

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Minnesota is rated Outstanding. Investments in the broader statewide or regional areas supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 501.8 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 20 grants and donations, totaling \$10.5 million to nine organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Minneapolis CSA	45	78,621	50	255,030	95	65.52	333,651	79.69	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	4	1,623	4	2.76	1,623	0.39	0	0
Indirect Benefit	25	16,850	21	66,555	46	31.72	83,405	19.92	0	0
Total	70	95,471	75	323,208	145	100.0	418,679	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing and community service. By dollar volume, 98.3 percent of investments supported affordable housing and 1.7 percent funded community services to low- and moderate-income individuals.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During the evaluation period, the bank made 28 LIHTC investments totaling \$206.7 million that supported 2,583 affordable housing units.

Qualified investments made during the evaluation period include:

- Four grants totaling \$4 million to an affordable housing organization. The organization focuses on the acquisition, rehabilitation, and development of one- to four-family buildings to increase the affordable housing supply. They also provided innovative financing tools, including a new mortgage product for first-time home buyers, and training for first-time home buyers and landlords. Efforts were concentrated in low- and moderate-income areas.
- A grant totaling \$3.6 million to an economic development corporation that assists low- to moderate-income small business owners bolster their wealth-building opportunities. The organization focuses on targeted procurement and improved access to capital, as well as access to training, mentorship, talent, capital investments, and social capital.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test conclusion for the state of Minnesota. The bank made four donations totaling \$1.6 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These donations promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$83.4 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included LIHTCs that supported 2,004 affordable units and HTCs.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Minneapolis CSA	100.0	31	100.0	9.7	16.1	25.8	45.2	3.2	5.3	20.3	44.3	29.2	0.9
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 10 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which five were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Minneapolis CSA included a Community Center Branch located in a low-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 90 deposit-taking ATMs in the AA, of which 6.7 percent were in low-income geographies and 20 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Minneapolis CSA	28	0	3	5	9	11	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 28 branches, of which three were in low-income geographies and five were in moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenience the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Minneapolis CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total of 1,018 qualified CD service activities to 35 organizations, for a total of 1,626 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 168 hours participating on boards and committees for four different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial education and small business for the underserved populations.

Service activities during the evaluation period include:

- JPMCB partnered with a nonprofit that specialized in financial education, guidance, advocacy, and support and provided 242 community service hours. The services offered by the organization included budget counseling, debt management plans to pay with credit card balances and other bills, housing counseling, foreclosure prevention, student loan counseling, bankruptcy counseling and education, and financial education.
- A JPMCB bank employee provided 48 hours serving as a board member of a nonprofit organization that supports the community by helping small businesses and providing low-cost programming to the community.

State of Mississippi

CRA Rating for the State of Mississippi: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Mississippi

Examiners assessed performance in a single AA in the state of Mississippi rating area. This AA was comprised of a portion of the Jackson, MS (Jackson) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Mississippi is JPMCB's 49th largest rating area. As of June 30, 2023, the bank had approximately \$93.9 million in deposits in the state of Mississippi rating area, of which approximately \$92.6 million represent retail branch deposits. As of December 31, 2023, the bank operated three branches and 10 deposit taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$146 million in loans, or 0.0 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 28 banks operating 166 branches in the state rating area. JPMCB ranked 28th in deposit market share with 0.3 percent. Primary competitors include Regions Bank with 18.3 percent deposit market share, PNC Bank National Association with 10.61 percent deposit market share, and Wells Fargo Bank National Association with 10 percent.

The Jackson MSA AA consists of Hinds, Madison, and Rankin counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 30 banks operating 174 branches in the AA. JPMCB operated three branches in the AA and was ranked 15th in deposit market share with 0.5 percent. Primary competitors include Trustmark National Bank with 31.7 percent deposit market share, Regions Bank

with 19.3 percent, and Bankplus with 14.8 percent. As of December 31, 2023, the bank operated 10 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Jackson MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Jackson MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	112	14.3	25.0	27.7	32.1	0.9
Population by Geography	492,837	9.6	18.3	33.4	37.6	0.9
Housing Units by Geography	202,176	10.0	19.0	34.3	36.7	0.0
Owner-Occupied Units by Geography	119,320	5.1	12.9	35.2	46.8	0.0
Occupied Rental Units by Geography	60,349	15.8	27.7	34.7	21.7	0.0
Vacant Units by Geography	22,507	20.8	27.7	28.6	22.7	0.1
Businesses by Geography	51,398	6.3	16.7	31.9	45.0	0.1
Farms by Geography	1,541	2.3	8.7	34.4	54.6	0.1
Family Distribution by Income Level	123,721	21.7	16.2	17.9	44.2	0.0
Household Distribution by Income Level	179,669	23.7	15.1	16.0	45.1	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$55,459	Median Housing Value			\$137,378
			Median Gross Rent			\$819
			Families Below Poverty Level			13.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Jackson MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	13.1	21.5	30.8	33.1	1.5
Population by Geography	493,918	8.1	18.6	34.0	38.9	0.4
Housing Units by Geography	209,318	10.4	20.7	33.6	34.6	0.7
Owner-Occupied Units by Geography	124,439	4.8	13.5	37.7	43.8	0.1
Occupied Rental Units by Geography	61,212	18.9	31.4	27.1	20.8	1.8
Vacant Units by Geography	23,667	17.5	31.2	28.3	21.9	1.1
Businesses by Geography	83,946	6.8	17.4	30.0	42.7	3.1
Farms by Geography	2,607	3.5	12.5	33.6	49.3	1.2

Table A – Demographic Information of the Assessment Area Assessment Area: Jackson MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	122,837	20.9	15.5	19.4	44.2	0.0
Household Distribution by Income Level	185,651	22.8	15.4	16.9	44.9	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$67,202	Median Housing Value			\$149,934
			Median Gross Rent			\$904
			Families Below Poverty Level			10.7%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Jackson MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Jackson MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2015 ACS data.

In the Jackson MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$693 according to 2015 ACS data and \$840 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,109 according to 2015 ACS data and \$1,344 according to 2020 Census data. The monthly mortgage payment for the median home in the Jackson MSA would be \$737 using 2015 ACS data and \$805 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 31.5 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Jackson MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Jackson MSA, 13.8 percent of families had incomes below the FPL according to the 2015 ACS and 10.7 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Jackson MSA was 2.2 percent compared to the state of Mississippi at 2.6 percent and the national unemployment rate of 3.5 percent.

Economic Data

Jackson's economy has weakened with the government sector and vital manufacturing industry shedding jobs. Government is a key source of mid-wage jobs in the Jackson area. The jobless rate fell more than two percentage points below its pre-pandemic rate, but the subpar labor force recovery suggests underlying weakness in the labor market. The housing market was slightly more resilient than the nation's. House prices stabilized slightly above year-ago levels while single-family permitting was on the upswing after hitting a 15-year low last winter. The area's strengths included the presence of large hospitals that helps limit employment volatility and rising educational attainment that points to improving workforce quality. Weaknesses included a heavy dependence on the public sector, weak and worsening net migration, sluggish household formation, and poor infrastructure that increases exposure to extreme weather events.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, community development and economic development. Contacts noted that during the COVID-19 pandemic the area was impacted by supply-chain issues and lack of workforce availability. Identified needs include:

- Small dollar loans and flexible lending opportunities for low- and moderate-income families/individuals
- Financial education
- Funding to support renovation and rehabilitation of rental properties
- Funding for small businesses, including gap financing, micro-loans and start-up financing
- Affordable Housing
- Mortgage and rental payment assistance and housing counseling services

Scope of Evaluation in State of Mississippi

Examiners selected the Jackson MSA for full-scope review. There were no other AAs within the state of Mississippi. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

The bank's performance under the Lending Test in the state of Mississippi is rated Low Satisfactory. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Jackson MSA	414	3,137	63	0	3,614	99.9	100.0
Broader Statewide/Regional Area							
Indirect Benefit				2	2	0.1	
Total	414	3,137	63	2	3,616	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Jackson MSA	96,737	36,427	616	0	133,780	91.5	100.0
Broader Statewide/Regional Area							
Indirect Benefit				12,398	12,398	8.5	
Total	96,737	36,427	616	12,398	146,178	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 15th among 30 depository financial institutions, placing it in the top 50 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 39th among 299 home mortgage lenders in the AA, which placed it in the top 14 percent of lenders. The top three lenders were Trustmark National Bank (15.7 percent), Cadence Bank (9.7 percent), and Bankplus (8.4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 8.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 84 small business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (26.9 percent), Capital One (9.4 percent), and Synchrony Bank (5.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 8.7 percent based on the number of small loans to farms originated or purchased. The bank ranked fourth among 22 small farm lenders in the AA, which placed it in the top 19 percent of lenders. The top three lenders were Bankplus (23 percent), Trustmark National Bank (18.5 percent), and John Deere Financial (15.1 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Mississippi 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of lending in low-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Mississippi 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and well below the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Mississippi 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to the bank not making or originating any small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but was near to the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Mississippi 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank did not originate any CD loans within the Jackson MSA. CD lending had a neutral effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 55 loans in the amount of \$10.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	6	865
Federal Housing Administration (FHA)	2	235
Homebuyer Education Grants	2	1
Home Lending SPCP	11	2,430
Community Lending Program (Correspondent SPCP)	3	437
Veteran's Administration (VA)	3	1,102
VA Purchase Closing Credit	1	600
Business Card SPCP	12	42
Business Banking SPCP	3	189
Paycheck Protection Program (PPP)	12	4,234
Total	55	10,135

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test conclusion for the state of Mississippi.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$12.4 million of CD loans in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve those AA. These loans primarily supported affordable housing.

INVESTMENT TEST

The bank's performance under the Investment Test in the Mississippi is rated Outstanding. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 274.3 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Jackson MSA	7	4,681	2	21,571	9	28.1	26,252	39.6	0	0
Broader Statewide/Regional Area										
Indirect Benefit	21	27,919	2	12,150	23	71.9	40,069	60.4	0	0
Total	28	32,600	4	33,721	32	100.0	66,321	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank's two investments were LIHTC totaling \$21.6 million that supported 226 affordable housing units. One of these investments was a \$9.3 million LIHTC that provided 120 affordable housing units to low-and moderate-income individuals and families in the AA, of which 119 units were covered by a project-based Section 8 HAP contract.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test conclusion for the state of Mississippi. Because the bank was responsive to CD needs and opportunities in its AA(s), examiners considered \$71.9 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments promoted affordable housing and included LIHTC investments supporting 1,956 affordable housing units.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Jackson MSA	100.0	3	100.0	0.0	0.0	0.0	66.7	33.3	8.1	18.6	34.0	38.9	0.4
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low- or moderate-income geographies. Examiners considered two branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which one was within 1,000 feet of a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 10 deposit-taking ATMs in the AA, none of which were in low- or moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Jackson MSA	3	0	0	0	0	2	1
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening 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. During the evaluation period, the bank entered the AA and opened three branches, none of which were in low- or moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenience the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branches locations in the AA. Business hours were from 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Jackson MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total of 149 qualified CD service activities to 20 organizations, for a total of 197 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with financial education and technical assistance for the underserved populations.

Service activities during the evaluation period include:

- Bank employees provided 32 hours of community service and technical assistance to a nonprofit that provided low- and moderate-income individuals and families with basic needs for food, shelter, and clothing, while also connecting them to affordable housing, quality childcare, and employment opportunities.
- JPMCB partnered with 16 CCAs and provided tailored credit counseling and debt education to 106 low- and moderate-income individuals. The services offered included debt counseling, homebuyer counseling, foreclosure prevention and support, student loan counseling, and financial education.

State of Montana

CRA Rating for the State of Montana: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Montana

Examiners assessed performance in two AAs in the state of Montana rating area. These were comprised of a portion of the Billings, MT (Billings) MSA and two counties in the non-MSA Montana AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Montana is JPMCB's 53rd largest rating area. As of June 30, 2023, the bank had approximately \$66 million in deposits in the state of Montana rating area, of which approximately \$64.1 million represent retail branch deposits. As of December 31, 2023, the bank operated four branches and 14 deposit taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$565.9 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 21 banks operating 109 branches in the state rating area. JPMCB ranked 13th in deposit market share with 0.2 percent. Primary competitors include Glacier Bank with 21.6 percent deposit market share, First Interstate Bank with 19.7 percent, and US Bank National Association with 14 percent.

Billings MSA

The Billings MSA AA consists of Yellowstone County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 12 banks operating 44 branches in the AA. JPMCB operated two branches in the AA and was ranked 11th in deposit market share with 0.63 percent. Primary competitors

include First Interstate Bank with 23.8 percent deposit market share, U.S. Bank with 20.1 percent, and Stockman Bank of Montana with 16 percent. As of December 31, 2023, the bank operated eight deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Billings MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Billings MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	3.1	25.0	56.3	15.6	0.0
Population by Geography	153,692	2.8	21.5	57.6	18.1	0.0
Housing Units by Geography	65,792	2.5	24.1	57.1	16.4	0.0
Owner-Occupied Units by Geography	41,950	1.2	19.0	60.2	19.6	0.0
Occupied Rental Units by Geography	19,492	5.1	34.8	49.6	10.5	0.0
Vacant Units by Geography	4,350	3.0	24.7	60.5	11.8	0.0
Businesses by Geography	18,590	2.3	28.2	53.2	16.4	0.0
Farms by Geography	804	1.5	14.8	64.7	19.0	0.0
Family Distribution by Income Level	38,586	19.5	18.1	21.9	40.5	0.0
Household Distribution by Income Level	61,442	23.3	16.2	18.2	42.3	0.0
Median Family Income MSA - 13740 Billings, MT MSA		\$66,565	Median Housing Value			\$193,434
			Median Gross Rent			\$799
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Billings MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	0.0	22.2	61.1	16.7	0.0
Population by Geography	164,731	0.0	20.9	57.3	21.8	0.0
Housing Units by Geography	72,524	0.0	22.0	57.9	20.1	0.0
Owner-Occupied Units by Geography	46,866	0.0	17.6	59.6	22.8	0.0
Occupied Rental Units by Geography	21,181	0.0	30.7	54.3	14.9	0.0
Vacant Units by Geography	4,477	0.0	28.0	56.7	15.3	0.0
Businesses by Geography	26,090	0.0	21.6	54.1	24.3	0.0
Farms by Geography	1,051	0.0	12.9	61.9	25.1	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Billings MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	42,284	20.4	17.7	21.5	40.4	0.0
Household Distribution by Income Level	68,047	23.7	15.9	19.2	41.3	0.0
Median Family Income MSA - 13740 Billings, MT MSA		\$80,720	Median Housing Value			\$238,215
			Median Gross Rent			\$931
			Families Below Poverty Level			6.9%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Billings MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Billings MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Billings MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$832 according to 2015 ACS data and \$1,009 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,331 according to 2015 ACS data and \$1,614 according to 2020 Census data. The monthly mortgage payment for the median home in the Billings MSA would be \$1,038 using 2015 ACS data and \$1,279 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Billings MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Billings MSA, 8.1 percent of families had incomes below the FPL according to the 2015 ACS and 6.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Billings MSA was 3.5 percent compared to the state of Montana at 3.8 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Billings MSA's economy lost steam, with job losses in the healthcare industry weighing on overall job growth and masking an increase in leisure/ hospitality employment. The area relies heavily on tourism and its share of leisure/hospitality employment is among the highest of metro areas nationally because it serves as a hub for visitors to Yellowstone National Park and numerous state parks. While the unemployment rate fell to a record low, most of the decline was attributed to a shrinking labor force. House prices declined after rising through 2022 and builders pulled back on single-family permitting in response. The area's strengths included steady population growth, including favorable migration patterns, proximity to popular tourist attractions, and serving as a healthcare hub for surrounding rural communities. Weaknesses included a lack of high-wage industries, a remote location with high transportation costs, and an over reliance on cyclical tourism which creates exposure to economic downturns.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on economic development and housing. Contacts noted that the area has experienced an influx of new residents, particularly from Colorado, Wyoming, and California. Unemployment in the area is low, so businesses are providing greater flexibility to attract employees by adjusting business models and allowing hybrid working options. Credit and CD needs in the area include:

- Affordable housing
- Access to credit for small businesses
- Support for workforce development programs for young adults choosing not to attend college.

Scope of Evaluation in State of Montana

Examiners selected the Billings MSA for full-scope review, as it represented the largest concentration of deposits in the state of Montana. The MSA accounts for 64.7 of the bank's adjusted deposits and 32.4 percent of lending in the state. The non-MSA Montana AA received a limited-scope review. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Billings MSA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for that AA.

There were no low-income geographies in the Billings MSA and non-MSA Montana AA during the 2022 through 2023 analysis period. Geographic conclusions for this period were based solely on performance in moderate-income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN STATE OF MONTANA

LENDING TEST

The bank's performance under the Lending Test in the state of Montana is rated High Satisfactory. Performance in the limited-scope AA supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Billings MSA	260	1,546	39	0	1,845	32.4	65.7
Limited-Scope							
Non-MSA MT	484	3,281	88	1	3,854	67.6	34.3
Total	744	4,827	127	1	5,699	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Billings MSA	74,501	18,307	447	0	93,255	16.5	65.7
Limited-Scope							
Non-MSA MT	431,191	40,222	991	325	472,729	83.5	34.3
Total	505,692	58,529	1,438	325	565,984	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.6 percent. The bank ranked 11th among 12 depository financial institutions, placing it in the top 92 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 26th among 206 home mortgage lenders in the AA, which placed it in the top 13 percent of lenders. The top three lenders were Stockman Bank (13.9 percent), Opportunity Bank of Montana (9.5 percent), and Glacier Bank (6.7 percent).

In overall small loans to businesses for 2022, the bank had a market share of 12.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 53 small business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (18.3 percent), Capital One (9.3 percent), and U.S. Bank (7.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 6.1 percent based on the number of small loans to farms originated or purchased. The bank ranked sixth among 11 small farm lenders in the AA, which placed it in the top 55 percent of lenders. The top three lenders were Stockman Bank (30.8 percent), First Interstate Bank (18.7 percent), and John Deere Financial (15 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Montana 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Montana 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of Montana 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Montana 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Billings MSA. CD lending had a neutral effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made little use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 11 loans in the amount of \$2.5 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	2	415
Federal Housing Administration (FHA)	1	314
Chase Homebuyer Grant Loans	2	417
Homebuyer Education Grants	2	1
Veteran's Administration (VA)	2	840
VA Purchase Closing Credit	1	425
Paycheck Protection Program (PPP)	1	50
Total	11	2,462

Conclusions for Area Receiving Limited-Scope Review

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

Refer to Tables O through T in the state of Montana 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 Montana is rated Outstanding. Performance in the limited-scope AA and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had 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 dollar volume of current- and prior-period investments represented 11.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants totaling \$20,000 to an organization.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Billings MSA	1	198	3	305	4	26.7	503	0.4	0	0
Limited Review										
Non-MSA MT	1	173	1	301	2	13.3	474	0.4	0	0
Broader Statewide/Regional Area										
Indirect Benefit	5	1,946	4	110,593	9	60.0	112,539	99.1	0	0
Total	7	2,318	8	111,199	15	100.0	113,516	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 96 percent of investments supported affordable housing, and four percent funded community services to low- and moderate-income individuals.

The bank did not use innovative and/or complex investments to support CD initiatives during the evaluation period. CD investment in the AA includes two grants totaling \$20,000 to the local chapter of a nationwide organization dedicated to community service to low- and moderate-income persons. One grant supported a program that delivers housing assistance, mental health support, and hospital care services. The other grant supported a program that focused on assisting elementary-age students with educational success, housing stability, and promoting financial health programs.

Conclusions for Area Receiving a Limited-Scope Review

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

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test conclusion for the state of Montana. Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$112.5 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included a renewable energy tax credit and LIHTCs that supported 678 affordable units and NMTCs.

SERVICE TEST

The bank's performance under the Service Test in the state of Montana is rated Outstanding. Performance in the limited-scope AA had a neutral impact on the Service Test conclusion for the state of Montana.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Billings MSA	65.7	2	50.0	0.0	50.0	50.0	0.0	0.0	0.0	20.9	57.3	21.8	0.0
Limited-Scope													
Non-MSA MT	34.3	2	50.0	0.0	50.0	0.0	50.0	0.0	0.0	8.9	30.0	61.0	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income geographies in the AA.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had eight deposit-taking ATMs in the AA, of which 50 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Billings MSA	2	0	0	2	0	0	0
Limited-Scope							
Non-MSA MT	2	0	0	1	1	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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. During the evaluation period, the bank entered the AA and opened two branches, of which both were in moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Billings MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 71 qualified CD service activities to 13 organizations, for a total of 82 hours. Most of the bank's assistance was dedicated to organizations providing community services for low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with financial education and technical assistance for the underserved populations.

Service activities during the evaluation period include:

- JPMCB partnered with 12 CCAs and provided 54 hours of community service and technical assistance to nonprofit organizations benefiting low- and moderate-income individuals with financial literacy education programs. Services include credit counseling, debt consolidation, bankruptcy

counseling services, student loan counseling and educational and literacy programs targeting underserved populations.

- JPMCB bank employees provided nine hours of technical assistance to an organization that provided responsive care for low- and moderate-income families. Programs included occupational therapy, nutrition assessment, psychological evaluations, play therapy, socialization, civil and legal representation, and counseling.

Conclusions for Area Receiving Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the non-MSA Montana was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the limited-scope AA supported the overall Service Test conclusion

State of Nebraska

CRA Rating for the State of Nebraska²⁴: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made few, if any CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Nebraska

Examiners assessed performance in a single AA in the state of Nebraska rating area. This AA was comprised of a portion of the Lincoln, NE (Lincoln) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Nebraska is JPMCB's 51st largest rating area. As of June 30, 2023, the bank had approximately \$75.6 million in deposits in the state of Nebraska rating area, of which approximately \$75.3 million represent retail branch deposits. As of December 31, 2023, the bank operated one branch and three deposit taking ATMs in the rating area, representing less than 0.1 percent of total branches and total ATMs. The bank originated and purchased approximately \$12.2 million in loans, or 1.9 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 28 banks operating 108 branches in the state rating area. JPMCB ranked 20 in deposit market share with 0.61 percent. Primary competitors include Union Bank and Trust Company with 37 percent, Wells Fargo with 11 percent, and Pinnacle Bank with 8.4 percent.

The Lincoln MSA AA consists of Lancaster County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 28 banks operating 108 branches in the AA. JPMCB operated one branch in the AA and was ranked 20th in deposit market share with 0.6 percent. Primary competitors

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.

include Union Bank and Trust Company with 37 percent deposit market share, Wells Fargo Bank with 11 percent, and Pinnacle Bank with 8.6 percent. As of December 31, 2023, the bank operated three deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Lincoln CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Lincoln MSA 2020						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	6.8	28.4	28.4	29.7	6.8
Population by Geography	298,080	5.6	26.3	34.0	30.9	3.2
Housing Units by Geography	123,773	7.3	28.2	34.0	29.7	0.8
Owner-Occupied Units by Geography	69,852	1.6	19.5	38.5	40.2	0.2
Occupied Rental Units by Geography	47,815	15.0	39.6	28.8	15.0	1.6
Vacant Units by Geography	6,106	13.0	38.5	23.9	23.6	1.1
Businesses by Geography	23,582	3.7	26.7	29.6	38.2	1.8
Farms by Geography	996	1.4	12.3	23.3	62.9	0.1
Family Distribution by Income Level	70,549	21.3	17.1	21.2	40.5	0.0
Household Distribution by Income Level	117,667	23.7	16.8	17.3	42.1	0.0
Median Family Income MSA - 30700 Lincoln, NE MSA		\$70,200	Median Housing Value			\$152,644
			Median Gross Rent			\$726
			Families Below Poverty Level			9.3%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Lincoln MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	7.4	21.0	32.1	33.3	6.2
Population by Geography	322,608	6.2	20.7	35.9	33.9	3.3
Housing Units by Geography	133,081	8.4	23.2	36.3	31.2	1.0
Owner-Occupied Units by Geography	74,937	2.3	15.6	41.2	40.7	0.1
Occupied Rental Units by Geography	51,729	16.4	33.7	29.0	19.0	1.9
Vacant Units by Geography	6,415	15.9	26.4	37.1	17.7	2.9
Businesses by Geography	35,643	5.7	16.6	31.9	43.1	2.6
Farms by Geography	1,454	3.4	8.5	32.3	55.0	0.7

Table A – Demographic Information of the Assessment Area Assessment Area: Lincoln MSA 2021-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	76,036	19.3	18.7	22.2	39.8	0.0
Household Distribution by Income Level	126,666	22.9	17.1	19.6	40.5	0.0
Median Family Income MSA - 30700 Lincoln, NE MSA		\$82,381	Median Housing Value			\$191,979
			Median Gross Rent			\$879
			Families Below Poverty Level			6.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Lincoln MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Lincoln MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2020 Census data.

In the Lincoln MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$878 according to 2015 ACS data and \$1,030 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,404 according to 2015 ACS data and \$1,648 according to 2020 Census data. The monthly mortgage payment for the median home in the Lincoln MSA would be \$819 using 2015 ACS data and \$1,031 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 41.9 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Lincoln MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Lincoln MSA, 9.3 percent of families had incomes below the FPL according to the 2015 ACS and 6.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Lincoln CSA was 2.1 percent compared to the state of Nebraska at 2.2 percent and the national unemployment rate of 3.5 percent.

Economic Data

Job growth in the Lincoln area proved resilient. Gains were broad-based, but the outsized public sector and leisure/hospitality were leading job additions, offsetting cuts in professional/business services and finance. The unemployment rate edged higher even as the labor force contracts, suggesting that job losses in a few industries took their toll. For decades, population growth in the Lincoln area exceeded that of Nebraska. The inventory of houses for sale was near a post-pandemic low. Limited supply put upward pressure on prices, although monthly gains slowed over the year to trail both Nebraska and the nation. Residential construction was on the upswing. The area's strengths included the presence of the University of Nebraska, good transportation infrastructure, below average employment volatility, comparatively equal distribution of income and wealth, and high economic vitality. Weaknesses included a high dependence on state government and an outflow of skilled labor.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on economic development, affordable housing, small business, and community services. Contacts noted that the local economy is strong and diverse with healthcare, education, manufacturing, and agricultural food production helping to maintain the economy. The biggest issue for businesses in the area is the lack of labor. There is a need for jobs that pay better wages to help attract and retain employees. There is also a need for affordable housing. Many of the affordable housing units in the area are in disrepair and in need of renovations and rehabilitation. Housing development is primarily focused on more expensive single-family homes. There is a need for agricultural loans as well as small business loans. Contacts also indicated that there is a need for financial education for low- and moderate-income individuals.

Scope of Evaluation in State of Nebraska

Examiners selected the Lincoln CSA for full-scope review. There were no other AAs within the state of Nebraska. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA

LENDING TEST

The bank's performance under the Lending Test in the state of Nebraska is rated High Satisfactory. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Lincoln CSA	602	3,413	63	0	4,078	99.9	100.0
Broader Statewide/Regional Area							
Indirect Benefit				3	3	0.1	
Total	602	3,413	63	3	4,081	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Lincoln CSA	139,165	38,469	600	0	17,8234	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				2,384	2,384	1.3	
Total	139,165	38,469	600	2,384	20,207	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.6 percent. The bank ranked 20th among 28 depository financial institutions, placing it in the top 72 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 36th among 218 home mortgage lenders in the AA, which placed it in the top 17 percent of lenders. The top three lenders were Union Bank and Trust Company (10.8 percent), Lincoln Federal Savings Bank of Nebraska (8.1 percent), and Pinnacle Bank (7.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 21.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 57 small business lenders in the AA. The other top lenders were American Express (15.3 percent), U.S. Bank (13 percent), and Capital One (11.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 6.4 percent based on the number of small loans to farms originated or purchased. The bank ranked fifth among 14 small farm lenders in the AA, which placed it in the top 36 percent of lenders. The top three lenders were Pinnacle Bank (29.8 percent), Union Bank and Trust Company (20.6 percent), and John Deere Financial (19.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. Greater weight was placed on moderate-income geographies.

Home Mortgage Loans

Refer to Table O in the state of Nebraska 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Nebraska 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the state of Nebraska 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

A review of home mortgage loans and small loans to businesses, including summary reports and maps, did not identify any unexplained conspicuous lending gaps in the AA.

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Nebraska 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Lincoln CSA. CD lending had a neutral effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 21 loans in the amount of \$13.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	4	489
Chase Homebuyer Grant Loans	11	1,629
Homebuyer Education Grants	1	1
Paycheck Protection Program (PPP)	5	11,013
Total	21	13,132

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Nebraska.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$2.4 million of CD loans in the broader statewide or regional areas that include the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These loans primarily supported revitalization and stabilization efforts.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Nebraska is rated Outstanding. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, although rarely in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 94.3 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Lincoln CSA	4	1,645	3	5,702	7	21.9	7,347	20.8	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	1	41	1	3.1	41	0.1	0	0
Indirect Benefit	4	1,368	20	26,488	24	75.0	27,857	79.1	0	0
Total	8	3,013	24	32,231	32	100.0	35,244	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made three LIHTC investments totaling \$5.7 million that supported 323 units of affordable housing. An example of these CD investments in the AA included a \$2.8 million LIHTC equity investment in an affordable housing development. The project included 131 units targeted to low- and moderate-income individuals and families.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Nebraska. The bank made one grant for \$41,070 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. This grant promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered 24 investments totaling \$27.9 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included LIHTCs that supported 530 affordable units and a NMTC.

SERVICE TEST

The bank's performance under the Service Test in the state of Nebraska is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Delivery systems were reasonably accessible to significant portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Lincoln CSA	100.0	1	100.0	0	0	0	1	0	6.2	20.7	35.9	33.9	3.3
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank had only one branch in the AA, which was in an upper-income geography. Examiners considered that this branch served residents of low- or moderate-income geographies, which had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. The bank had three deposit-taking ATMs in the AA, none of which were in low- or moderate-income geographies. Bank provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Lincoln CSA	0	0	0	0	0	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

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

Services, including where appropriate, business hours, did not vary in a way to inconvenience the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at the one branch location in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Lincoln CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total 158 qualified CD service activities to 20 organizations, for a total of 253 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and financial capability training.

Service activities during the evaluation period include:

- JPMCB conducted four financial education training sessions for a total of 11 hours, that reached 418 individuals from underserved populations.

State of Nevada

CRA Rating for the State of Nevada: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall adequate level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Nevada

Examiners assessed performance in two AAs in the state of Nevada rating area. These were comprised of the entire Las Vegas-Henderson-Paradise, NV (Las Vegas) MSA and the majority of the Reno-Carson City-Fernley, NV (Reno) CSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Nevada is JPMCB's 18th largest rating area. As of June 30, 2023, the bank had approximately \$8.9 billion in deposits in the state of Nevada rating area, of which approximately \$8.7 billion represent retail branch deposits. As of December 31, 2023, the bank operated 55 branches and 169 deposit taking ATMs in the rating area, representing 1.1 percent of total branches and 1.1 percent of total ATMs. The bank originated and purchased approximately \$4.9 billion in loans, or 0.8 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 44 banks operating 377 branches in the state rating area. JPMCB ranked fifth in deposit market share with 7.7 percent. Primary competitors include Wells Fargo Bank with 19.1 percent deposit market share, Bank of America with 19.3 percent, and Wells Fargo National Bank West with 11.5 percent.

Las Vegas MSA

The Las Vegas MSA AA consists of Clark County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 37 banks operating 271 branches in the AA. JPMCB operated 44

branches in the AA and was ranked fifth in deposit market share with 8.2 percent. Primary competitors include Bank of America with 19.2 percent deposit market share, Wells Fargo Bank with 17 percent, and Wells Fargo National Bank West with 13.5 percent. As of December 31, 2023, the bank operated 132 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Las Vegas MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Las Vegas MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	137,264	3.8	20.8	38.7	36.1	0.6
Farms by Geography	1,912	2.1	19.7	39.9	38.2	0.2
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$169,213
			Median Gross Rent			\$1,032
			Families Below Poverty Level			11.9%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Las Vegas MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	535	6.9	23.9	39.1	29.5	0.6
Population by Geography	2,265,461	6.8	23.8	39.7	29.5	0.2
Housing Units by Geography	912,465	6.9	24.4	39.1	29.4	0.2
Owner-Occupied Units by Geography	443,247	2.4	15.7	42.7	39.0	0.2
Occupied Rental Units by Geography	365,779	11.7	33.7	36.8	17.6	0.2
Vacant Units by Geography	103,439	8.7	29.1	31.8	29.9	0.4

Table A – Demographic Information of the Assessment Area Assessment Area: Las Vegas MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Businesses by Geography	281,734	3.6	27.5	32.6	36.0	0.3
Farms by Geography	3,127	3.9	25.3	33.8	36.9	0.1
Family Distribution by Income Level	516,891	20.9	18.0	20.2	40.9	0.0
Household Distribution by Income Level	809,026	23.1	17.1	18.2	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$71,896	Median Housing Value			\$282,327
			Median Gross Rent			\$1,203
			Families Below Poverty Level			9.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Las Vegas MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Las Vegas MSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering 2020 Census data.

In the Las Vegas MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$750 according to 2015 ACS data and \$899 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,200 according to 2015 ACS data and \$1,438 according to 2020 Census data. The monthly mortgage payment for the median home in the Las Vegas MSA would be \$908 using 2015 ACS data and \$1,516 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 46.2 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns in the Las Vegas MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Las Vegas MSA, 11.9 percent of families had incomes below the FPL according to the 2015 ACS and 9.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Las Vegas MSA was 5.3 percent compared to the state of Nevada at 5.0 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Las Vegas MSA's economy outperformed the West. Employment growth was strong across many private sector industries, but healthcare and leisure/hospitality led the charge in job creation. The industries were fueled by strong demographics and favorable trends in domestic travel. The jobless rate remained low and within one percentage point of its pre-pandemic level despite upward pressure from workers quickly returning to the workforce. The housing market experienced its first decline in single-family house prices in two years. The area's strengths included gaming and entertainment infrastructure, no personal income tax, strong migration trends, and a high concentration of prime-age workers. Weaknesses included an over reliance on consumer spending, high employment volatility, relatively low educational attainment, and expensive single-family housing.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on economic development and affordable housing. Contacts noted that the COVID-19 pandemic had a devastating effect on the local economy as the main economic driver in the area is travel and tourism including leisure, hospitality, and business conventions. These industries include many low-wage service employees who were already struggling prior to the pandemic. Contacts noted that there is a need for targeted credit and financial assistance for these individuals. Other identified credit and CD needs include:

- Affordable Housing
- Low-cost debt and equity financing for housing and other community development related projects
- Flexible loan products for low and moderate-income homebuyers
- Grant support for local nonprofit organizations

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

Scope of Evaluation in State of Nevada

Examiners selected the Las Vegas MSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Nevada. The MSA accounts for 90.4 percent of the bank's adjusted deposits and 81.9 percent of lending in the state. The Reno CSA received limited-scope reviews. Refer to the table in appendix A for more information.

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 Outstanding. Performance in the limited-scope AAs supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Las Vegas MSA	7,616	42,692	152	31	50,491	81.9	90.4
Limited-Scope							
Reno CSA	2,064	9,210	93	3	11,190	18.1	9.6
Total	9,680	51,902	245	34	61,681	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Las Vegas MSA	2,680,951	791,707	1,763	97,342	3,571,763	72.8	90.4
Limited-Scope							
Reno CSA	1,189,880	136,726	1,141	8,112	1,335,859	27.2	9.6
Total	3,870,831	928,433	2,904	105,454	4,907,622	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 8.2 percent. The bank ranked fifth among 37 depository financial institutions, placing it in the top 14 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 22nd among 556 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were Rocket Mortgage (6.5 percent), United Wholesale Mortgage (5.3 percent), and LoanDepot.com (4.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 168 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (28.2 percent), Bank of America (13.6 percent), and U.S. Bank (6.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 56.6 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 12 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (13.3 percent), U.S. Bank (12.4 percent), and Capital One (6.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies approximated the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of lending in low-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Nevada 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 31 CD loans totaling \$97.3 million, which represented 11.9 percent of the allocated tier 1 capital. By dollar volume, 67.8 percent of these loans funded affordable housing, 27.5 percent funded revitalization and stabilization efforts, 4.5 percent funded community services targeted to low- and moderate-income individuals, and 0.2 percent funded economic development. Of the total CD loans, the bank made 22 PPP loans totaling \$23.7 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$14.7 million loan to support the construction of a 171 senior housing unit new construction. All units, except for one, will be restricted to seniors with incomes of 30 to 70 percent of the AMI.
- A \$4.3 million bridge loan, as part of complex NMTC financing, to develop a distribution hub for a local food bank. The expansion of the food bank's distribution network will allow the organization to serve an additional 10,000 seniors monthly in an area where more than 30 percent of households live below the poverty line.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 4,417 loans in the amount of \$412.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	208	39,153
Federal Housing Administration (FHA)	34	8,781
Chase Homebuyer Grant Loans	101	24,489
Homebuyer Education Grants	87	44
Home Lending SPCP	20	5,162
Community Lending Program (Correspondent SPCP)	59	16,033
Veteran's Administration (VA)	27	10,854
VA Purchase Closing Credit	14	4,994
Business Card SPCP	99	408
Business Banking SPCP	56	5,244
Small Business Administration (SBA)	32	13,191
Paycheck Protection Program (PPP)	3,680	283,974
Total	4,417	412,327

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Reno CSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

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 Low Satisfactory. Performance in the limited-scope AA and investments in the broader statewide or regional areas had a neutral impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an adequate level of qualified CD investments and grants, not in a leadership position. During the evaluation period, the competition for investments was significant and investment opportunities were limited. The dollar volume of current- and prior-period investments represented 2.8 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 20 grants and donations totaling \$850,000 to 11 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Las Vegas MSA	14	18,405	21	4,325	35	71.4	22,730	14.6	0	0
Limited-Scope										
Reno CSA	3	1,046	6	132,177	9	18.4	133,223	85.3	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	3	58	3	6.1	25	0.0	0	0
Indirect Benefit	2	163	0	0	2	4.1	163	0.1	0	0
Total	19	19,614	30	136,527	49	100.0	156,141	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 72.3 percent of investments were LIHTCs and MBSs that supported affordable housing, 25.1 percent were NMTCs that supported revitalization and stabilization efforts, and 2.5 percent were grants and donations that funded community services to low-and moderate-income individuals.

The bank occasionally used innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one NMTC investment totaling \$3.5 million.

Qualified investments made during the evaluation period include:

- A \$3.5 million in NMTC equity investment in a local food bank. The investment helped the organization renovate one of their facilities located in a designated food desert into a food distribution hub. The renovation will allow the food bank to serve an additional 10,000 seniors monthly. The investment will revitalize and stabilize a moderate-income geography.
- A \$225,000 grant to a nonprofit organization to support their workforce re-training program. The program provided increased skill training to low- and moderate-income individuals, resulting in re-employment in a high skill, high demand industry sector with the resiliency to maintain employment.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Reno CSA was stronger than the bank's performance in the full-scope area due to a higher percentage of investment activity. Performance in the limited-scope AA did not impact the overall Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Nevada. The bank made three investments totaling \$58,000 to organizations in the broader statewide

or regional area whose purpose, mandate, or function included serving the bank's AA. This investment promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered two investments totaling \$163,000 of prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA.

SERVICE TEST

The bank's performance under the Service Test in the state of Nevada is rated Outstanding. Performance in the limited-scope AA had a neutral impact on the Service Test conclusion for the state of Nevada.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Las Vegas CSA	90.4	44	80.0	6.8	15.9	40.9	36.4	0.0	6.8	23.8	39.7	29.5	0.2
Limited-Scope													
Reno CSA	9.6	11	20.0	0.0	18.2	36.4	36.4	9.1	6.6	18.9	41.4	30.9	2.2
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was equal to and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners further considered 13 branches located in middle- or upper-income geographies that served residents of moderate-income geographies, of which 12 were within 1,000 feet of moderate-income geographies. In addition, JPMCB branches in the Las Vegas CSA included four Community Branches, of which two were in low-income geographies and one was in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. The bank had 132 deposit-taking ATMs in the AA, of which 7.6 percent were in low-income geographies and 20.5 percent were in moderate-income geographies. The bank provided data indicating

that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Las Vegas CSA	1	6	0	0	-2	-3	0
Limited-Scope							
Reno CSA	4	0	1	0	1	2	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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 one branch which was in an upper-income geography. The bank closed six branches, of which none were in low- or moderate-income geographies. The branch closures were the result of proximity to other branches and low transaction volume.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 4:30 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were 22 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Las Vegas CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 1,313 qualified CD service activities to 51 organizations, for a total of 1,913 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by two bank employees spending 63 hours participating on boards and committees for two different CD organizations. The bank's assistance was responsive to needs identified in the AA.

Service activities during the evaluation period include:

- JPMCB partnered with the county library district to provide financial capacity training sessions to 300 community members. The training covered financial stability, money management, and financial decisions, as well as explaining the mortgage process, mortgage products, services, and programs targeting low- and moderate-income homebuyers.

- JPMCB partnered with a nonprofit agency to provide financial capacity training to help ex-offenders successfully reenter the workforce, impacting 292 individuals. The training covered savings methods, budgeting, and consumer rights.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Reno CSA was weaker than the bank's performance in the full-scope area due to a lower branch distribution percentage in low-income geographies. Performance in the limited-scope AA had a neutral impact on the Service Test conclusion for the state of Nevada.

State of New Mexico

CRA Rating for the State of New Mexico: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AA. Investments in the broader statewide or regional areas positively impacted the overall Investment Test conclusion.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of New Mexico

Examiners assessed performance in a single AA in the New Mexico rating area. This AA was comprised of a portion of the Albuquerque, NM (Albuquerque) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of New Mexico is JPMCB's 44th largest rating area. As of June 30, 2023, the bank had approximately \$220.2 million in deposits in the state of New Mexico rating area, of which approximately \$217.4 million represent retail branch deposits. As of December 31, 2023, the bank operated seven branches and 19 deposit-taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$430.5 million in loans or 0.1 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 23 banks operating 105 branches in the state rating area. JPMCB ranked 11th in deposit market share with 1.2 percent. Primary competitors include Wells Fargo Bank with 29.1 percent deposit market share, Bank of America with 23.5 percent, and BMO Harris Bank, N.A. with 12.2 percent.

The Albuquerque MSA AA consists of Bernalillo County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 23 banks operating 107 branches in the AA. JPMCB operated six branches in the AA and was ranked 11th in deposit market share with 1.2 percent. Primary competitors include Wells Fargo Bank with 29.2 percent deposit market share, Bank of America with 23.5 percent,

and BMO Harris, N.A. with 12.3 percent. As of December 31, 2023, the bank operated 19 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Albuquerque MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Albuquerque MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	153	6.5	30.1	28.8	33.3	1.3
Population by Geography	673,943	6.6	32.8	27.1	33.0	0.5
Housing Units by Geography	287,054	7.2	30.9	28.7	32.8	0.4
Owner-Occupied Units by Geography	163,821	2.8	28.4	28.6	40.1	0.2
Occupied Rental Units by Geography	99,449	14.0	34.6	28.3	22.4	0.6
Vacant Units by Geography	23,784	9.7	32.4	31.2	26.2	0.6
Businesses by Geography	72,893	10.3	25.0	28.8	35.0	0.8
Farms by Geography	1,268	5.8	27.5	27.4	39.2	0.2
Family Distribution by Income Level	161,704	25.1	15.3	17.8	41.8	0.0
Household Distribution by Income Level	263,270	26.3	15.6	16.3	41.8	0.0
Median Family Income MSA - 10740 Albuquerque, NM MSA		\$60,032	Median Housing Value			\$196,050
			Median Gross Rent			\$825
			Families Below Poverty Level			15.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Albuquerque MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	176	8.0	23.9	34.7	29.5	4.0
Population by Geography	676,444	6.6	25.2	37.6	29.1	1.5
Housing Units by Geography	295,111	7.0	24.5	38.9	28.2	1.5
Owner-Occupied Units by Geography	172,529	3.3	21.5	39.5	34.7	1.0
Occupied Rental Units by Geography	99,999	12.7	28.9	38.5	17.8	2.1
Vacant Units by Geography	22,583	10.2	27.2	36.0	24.4	2.1
Businesses by Geography	108,845	11.0	23.4	32.5	31.1	2.1
Farms by Geography	1,756	6.3	21.5	39.3	31.6	1.3

Table A – Demographic Information of the Assessment Area Assessment Area: Albuquerque MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	159,218	23.2	16.0	18.9	41.9	0.0
Household Distribution by Income Level	272,528	25.8	15.5	17.1	41.6	0.0
Median Family Income MSA - 10740 Albuquerque, NM MSA		\$68,660	Median Housing Value			\$212,176
			Median Gross Rent			\$928
			Families Below Poverty Level			11.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Albuquerque MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Albuquerque MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Albuquerque MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$750 according to 2015 ACS data and \$858 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,201 according to 2015 ACS data and \$1,373 according to 2020 Census data. The monthly mortgage payment for the median home in the Albuquerque MSA would be \$1,052 using 2015 ACS data and \$1,139 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 50.9 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Albuquerque MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Albuquerque MSA, 15 percent of families had incomes below the FPL according to the 2015 ACS and 11.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Albuquerque MSA was 3.5 percent compared to the state of New Mexico at 3.6 percent and the national unemployment rate of 3.5 percent.

Economic Data

Albuquerque's economy was progressing. Following a slowdown in payroll growth in the first half of 2023, Albuquerque regained momentum, with monthly job growth surpassing the national rate and catching up to the state. The outsized government and leisure/hospitality sectors fueled employment gains. The steady rise in the unemployment rate stemmed from an above-average labor force expansion, and the rate remained a percentage point below pre-pandemic norms. Natural population decline has been underway since 2019. Net migration has been sporadic over the past decade. Bucking the national trend, Albuquerque house prices did not undergo a correction in 2023, and, although growth has slowed, house price appreciation was well ahead of the rest of the country. The area's strengths included a stable base of education, healthcare and scientific research jobs, serving as a regional hub with access to important trade corridors, and a budding high-tech industry supported by low costs and federal research facilities. Weaknesses included below-average per capita income, low worker productivity, and a high poverty rate.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on community and economic development. Contacts noted that Albuquerque serves as one of the retail and housing centers of the state with higher paying jobs. The local agricultural economy is marginal and many farmers supplement revenues with off-farm income. The area housing market has rapid turnover of available units, and new construction remains slow as few local contractors stayed in business after the great recession. Low- and moderate-income families cannot afford to purchase a home and many families utilize credit cards to meet day to day needs. Contacts also noted that there has been a sizable increase in both homelessness and the number of lower-income individuals and households. Identified community needs included:

- Small business loans to finance short term operating needs
- Financial education for low- and moderate-income households and individuals
- Affordable housing
- Flexible loan programs for start-up and expanding small businesses

Scope of Evaluation in State of New Mexico

Examiners selected the Albuquerque MSA for full-scope review. There were no other AAs within the state of New Mexico. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Albuquerque MSA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for that AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

The bank's performance under the Lending Test in the state of New Mexico is rated Outstanding. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Albuquerque MSA	1,324	7,439	63	2	8,828	100.0	100.0
Broader Statewide/Regional Area							
Indirect Benefit				1	1	0.01	
Total	1,324	7,439	63	3	8,829	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Albuquerque MSA	331,276	87,592	655	4,435	423,958	98.5	100.00
Broader Statewide/Regional Area							
Indirect Benefit				6,627	6,627	1.5	
Total	331,276	87,592	655	11,062	430,585	100.00	100.00

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.2 percent. The bank ranked 11th among 23 depository financial institutions, placing it in the top 48 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked 27th among 348 home mortgage lenders in the AA, which placed it in the top 8 percent of lenders. The top three lenders were Nusenda Federal Credit Union (8.7 percent), Waterstone Mortgage Corporation (7.3 percent), and Rocket Mortgage (6.4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 104 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (20.6 percent), Bank of America (8.5 percent), and U.S. Bank (8 percent).

In overall small loans to farms for 2022, the bank had a market share of 45.7 percent based on the number of small loans to farms originated or purchased. The bank ranked first among eight small farm

lenders in the AA. The other top lenders were U.S. Bank (19.6 percent), Bank of America (8.7 percent), and Wells Fargo Bank (8.7 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the New Mexico 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the New Mexico 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies but was near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies but was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the New Mexico 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of

loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the New Mexico 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase a sufficient number of small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$4.4 million, which represented 19.7 percent of the allocated tier 1 capital. These loans supported affordable housing and consisted of a \$3.1 million construction loan and a \$1.3 million permanent loan for an affordable housing development. The project created 45 senior units restricted to households earning 30 to 60 percent of the AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 181 loans in the amount of \$34.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	18	2,980
Federal Housing Administration (FHA)	4	587
Chase Homebuyer Grant Loans	14	3,517
Homebuyer Education Grants	6	3
Home Lending SPCP	25	7,210
Community Lending Program (Correspondent SPCP)	67	17,047
Veteran's Administration (VA)	5	1,659
VA Purchase Closing Credit	2	542
Business Card SPCP	18	67
Business Banking SPCP	4	500
Paycheck Protection Program (PPP)	18	572
Total	181	34,684

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of New Mexico.

Because the bank was responsive to CD needs and opportunities in its AA, examiners considered a \$6.6 million CD loan in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. This loan was a PPP loan that provided relief for an organization due to the COVID-19 pandemic.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of New Mexico is rated Outstanding. Investments in the broader statewide or regional areas had a positive impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 25.3 percent of allocated tier 1 capital. Of the total qualified investments, the bank made one qualifying grant totaling \$5,000 to an organization.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Albuquerque MSA	6	4,585	3	1,109	9	42.9	5,694	23.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	3	23	3	14.2	23	0.1	0	0
Indirect Benefit	8	8,834	1	10,153	9	42.9	18,987	76.9	0	0
Total	14	13,420	7	11,284	21	100.0	24,704	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited adequate responsiveness to credit and CD needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.9 percent of investments supported affordable housing and 0.1 percent supported economic development.

The bank did not use innovative and/or complex investments to support CD initiatives. Examples of CD investments in the AA include two investments in Fannie Mae Guaranteed Mortgage Pass-Through

Certificates totaling \$1.1 million. The proceeds were used to finance five affordable single-family homes in the bank's AA.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas positively impacted the Investment Test rating for the state of New Mexico. The bank made three investments totaling \$22,500 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. These investments promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$19 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included LIHTCs that supported 447 affordable units.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Albuquerque MSA	100.0	7	100.0	14.3	28.6	14.3	42.9	0.0	6.6	25.2	37.6	29.1	1.5
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 19 deposit-taking ATMs in the AA, of which 10.5 percent were in low-income geographies and 31.6 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their

usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Albuquerque MSA	7	0	1	2	3	1	0
* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened seven branches, of which one was in a low-income geography and two were in moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branches locations in the AA. Business hours were Monday through Friday from 9:00 a.m. to 5:00 p.m. and from 9:00 a.m. to 1:00 p.m. on Saturdays.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Albuquerque MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total of 182 qualified CD service activities to 21 organizations, for a total of 417 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 143 hours participating on boards and committees for four different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial education, community services and economic development for the underserved populations.

JPMCB employee dedicated 60 hours serving on the board and committees for a local chapter of a nationwide nonprofit organization that provided students from low- and moderate-income families with after school and summer programs. The organization provides workforce readiness, entrepreneurship, and financial literacy through experiential, hands-on programs.

The bank provided technical assistance and education trainings to a small business. The seminar delivered curriculum on business fundamentals covering topics such creating a business plan, navigating cash flow, operations management, and capital overview.

State of New York

CRA Rating for the State of New York²⁵: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of New York

Examiners assessed performance in seven AAs in the state of New York rating area. These were comprised of a majority of the Rochester, NY (Rochester) and Albany-Schenectady-Troy, NY (Albany) MSAs, the entire Syracuse, NY (Syracuse) MSA and Ithaca, NY (Ithaca) MSAs, portions of the Binghamton, NY (Binghamton) MSA and Buffalo-Cheektowaga, NY (Buffalo) MSA, and one county in the non-MSA New York AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of New York is JPMCB's 20th largest rating area. As of June 30, 2023, the bank had approximately \$5.8 billion in deposits in the state of New York rating area, of which approximately \$5.7 billion represent retail branch deposits. As of December 31, 2023, the bank operated 54 branches and 131 deposit taking ATMs in the rating area, representing 1.1 percent of total branches and 0.8 percent of total ATMs. The bank originated and purchased approximately \$2.3 billion in loans, or 0.4 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 52 banks operating 862 branches in the state rating area. JPMCB ranked fifth in deposit market share with 3.8 percent. Primary retail competitors include Manufacturers and Traders Trust Company with 40.2 percent, KeyBank with 12.7 percent, and Citizens Bank 10.4 percent.

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.

Rochester MSA

The Rochester MSA AA consists of Monroe, Ontario, and Wayne counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 17 banks operating 167 branches in the AA. JPMCB operated 23 branches in the AA and was ranked third in deposit market share with 15.9 percent. Primary competitors include Manufacturers and Traders Trust Company with 18.1 percent deposit market share, Canandaigua National Bank and Trust Company with 16.7 percent, and KeyBank. with 12.9 percent. As of December 31, 2023, the bank operated 47 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Rochester MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: FS Rochester CSA for Census 2010						
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	77,098	10.4	13.2	39.9	36.3	0.2
Farms by Geography	2,288	2.8	9.5	56.7	31.0	0.0
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%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Rochester CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	277	14.1	18.8	36.8	26.4	4.0
Population by Geography	963,184	10.5	18.0	39.7	31.0	0.9
Housing Units by Geography	422,110	10.4	19.5	40.8	28.6	0.7
Owner-Occupied Units by Geography	255,670	4.5	15.5	43.9	35.9	0.2

Table A – Demographic Information of the Assessment Area Assessment Area: Rochester CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	132,532	19.4	26.2	35.8	16.9	1.7
Vacant Units by Geography	33,908	19.3	23.1	37.7	18.6	1.3
Businesses by Geography	95,184	6.9	16.2	39.0	35.0	2.9
Farms by Geography	2,676	2.4	13.4	50.8	32.7	0.7
Family Distribution by Income Level	236,775	21.1	17.4	20.2	41.4	0.0
Household Distribution by Income Level	388,202	24.7	15.3	17.5	42.5	0.0
Median Family Income MSA - 40380 Rochester, NY MSA		\$80,423	Median Housing Value			\$149,696
			Median Gross Rent			\$939
			Families Below Poverty Level			8.9%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Rochester MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Rochester MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Rochester MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$847 according to 2015 ACS data and \$1,005 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,355 according to 2015 ACS data and \$1,608 according to 2020 Census data. The monthly mortgage payment for the median home in the Rochester MSA would be \$714 using 2015 ACS data and \$804 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 51.9 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Rochester MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Rochester MSA, 10.4 percent of families had incomes below the FPL according to the 2015 ACS and 9.1 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Rochester MSA was 4.1 percent compared to the state of New York at 4.4 percent and the national unemployment rate of 3.5 percent.

Economic Data

Rochester lost momentum in the second half of 2023. Payrolls were flat, with most industries backtracking. Construction had an especially difficult run, with already-low housing starts falling further. The unemployment rate increased, although that was driven by increases in the labor force participation rate. Major institutions such as the University of Rochester and Rochester Institute of Technology (RIT) made the Rochester area more reliant on private university jobs than any of the nation's 350 largest economies. Both schools returned to normalcy post-pandemic, with the matriculated student count at University of Rochester, the metro area's top employer, back above pre-pandemic levels. RIT's recovery was quick, and a full complement of students supporting spending, housing and workforce development. The schools also support a robust healthcare sector. House prices rose rapidly, driven by low supply. The already outsized education and healthcare sector continued to expand. The area's strengths included stability and support to high-wage jobs from educational institutions and hospitals, affordable housing, and solid educational attainment relative to its upstate and western New York peers. Weaknesses included a cold climate, persistent out-migration, and an over-dependence on legacy manufacturers.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the area. These organizations focused on affordable housing, small business and economic development, community services, and financial services for low- and moderate-income households. Contacts noted that pre-pandemic of the population in Rochester could not qualify for a mortgage due to credit issues. The pandemic led to layoffs in many middle-income jobs which have not returned resulting in a rise in families that are living below the poverty level. Contacts noted that homeownership used to be a way for low- and moderate-income households to build equity and wealth, however increasing home prices have made it difficult for these households to purchase homes, even with subsidy assistance. Much of the limited affordable housing that is available is in poor condition and in need of repairs. The area has a large Puerto Rican population as well as a large deaf community, both of which need programs and services available in Spanish and American Sign Language. Many people do not have access to reliable transportation, which impacts the ability to obtain and keep a job. Other needs identified include:

- Downpayment assistance and interest rate buy-down programs
- Workforce development
- Affordable Housing
- Grant funding for home renovation and repairs
- Financial Education and Literacy Programs
- Access to capital for small businesses
- Patient capital for area nonprofits and community development organizations

Syracuse MSA

The Syracuse MSA AA consists of Madison, Onondaga, and Oswego counties. According to the FDIC

Deposit Market Share Data, as of June 30, 2023, there were 15 banks operating 146 branches in the AA. JPMCB operated 12 branches in the AA and was ranked third in deposit market share with 11.4 percent. Primary competitors include Manufacturers and Traders Trust Company with 24.3 percent deposit market share, KeyBank, N.A. with 15.1 percent, and Bank of America with 9.2 percent. As of December 31, 2023, the bank operated 27 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Syracuse MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	186	12.4	18.8	40.9	24.7	3.2
Population by Geography	661,914	9.3	16.7	45.4	27.2	1.3
Housing Units by Geography	289,354	9.0	18.4	46.2	25.5	0.9
Owner-Occupied Units by Geography	172,959	2.6	14.0	51.7	31.6	0.1
Occupied Rental Units by Geography	83,270	19.1	26.5	35.5	16.2	2.7
Vacant Units by Geography	33,125	16.6	21.4	44.6	16.7	0.7
Businesses by Geography	50,051	8.1	14.0	42.4	33.3	2.2
Farms by Geography	1,703	2.0	12.7	50.9	33.8	0.6
Family Distribution by Income Level	160,300	21.8	17.2	20.4	40.6	0.0
Household Distribution by Income Level	256,229	24.9	15.6	17.4	42.1	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$68,468	Median Housing Value			\$124,267
			Median Gross Rent			\$766
			Families Below Poverty Level			10.7%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	206	9.2	19.4	44.2	23.3	3.9
Population by Geography	662,057	7.4	18.1	42.9	28.3	3.3
Housing Units by Geography	296,071	7.7	19.4	45.1	25.7	2.1
Owner-Occupied Units by Geography	176,179	2.3	15.6	49.5	32.2	0.4
Occupied Rental Units by Geography	83,726	16.9	26.6	35.6	16.2	4.6
Vacant Units by Geography	36,166	12.7	21.1	45.2	16.3	4.6
Businesses by Geography	60,812	7.0	14.5	42.1	29.6	6.7
Farms by Geography	1,977	2.0	14.1	53.2	29.7	1.1
Family Distribution by Income Level	160,048	21.9	17.4	20.6	40.1	0.0

Table A – Demographic Information of the Assessment Area						
Assessment Area: Syracuse MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Household Distribution by Income Level	259,905	24.8	15.6	17.9	41.7	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$79,766	Median Housing Value			\$140,613
			Median Gross Rent			\$859
			Families Below Poverty Level			10.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Syracuse MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Syracuse MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Syracuse MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$856 according to 2015 ACS data and \$997 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,369 according to 2015 ACS data and \$1,595 according to 2020 Census data. The monthly mortgage payment for the median home in the Syracuse MSA would be \$667 using 2015 ACS data and \$755 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 52 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Syracuse MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Syracuse MSA, 10.7 percent of families had incomes below the FPL according to the 2015 ACS and 10 percent of families had incomes below the FPL according to the 2020 Census.

Economic Data

The unemployment rate hit a cyclical low in the Syracuse area. Manufacturing experienced a sharper contraction in Syracuse than statewide. Education/healthcare made little progress, and employment had yet to return to its pre-pandemic level. However, professional/businesses services improved with growth outstripping the state and U.S. rates. Syracuse is home to several public and private universities, chief among them Syracuse University. Enrollment at SU increased for the past several years, reaching an all-time high in fall 2023, and the growing student demand has kept education employment on an upward

trajectory. Single-family house prices experienced a shallower correction than in New York state overall, buoyed by an undersupply of homes. Permitting in the metro area remained exceedingly low. The area's strengths included the presence of universities that provide stability, low business costs, and relatively affordable housing. Weaknesses included a low per capita income, weak demographics, including a steady outflow of college educated young adults, and a lack of a dynamic private sector growth driver outside of manufacturing.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Syracuse MSA was 4.1 percent compared to 4.4 percent for the state of New York and the national unemployment rate of 3.5 percent.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the area. These organizations focus on affordable housing and community financial services. In addition, a review was conducted of a five-year HUD consolidated plan for the area. Contacts noted that prior to the pandemic the city of Syracuse was seeing some growth, largely in the downtown area. There has been some housing development, but this has largely been market rate housing that is not affordable to low- and moderate-income households. Contacts noted that the Southside neighborhood in Syracuse has traditionally lacked access to credit. The neighborhood has high poverty and unemployment rates. While there are many properties with historic character, the neighborhood has a high vacancy rate, and many structures need rehabilitation or demolition. Most residents either have no credit history or bad credit. Many of the businesses in the Southside are small and consist of businesses such as corner stores, small restaurants, barbershops, and beauty salons. Larger businesses consist of national entities such as Family Dollar. There are many vacant or boarded-up store fronts in the area. There is a need for smaller dollar loans for start-up businesses and entrepreneurs, particularly those with limited credit histories or minor past delinquencies. Contacts noted that there is a need to improve the financial health of low- and very-low-income households. Other needs identified include financial capability programs and access to safe affordable housing.

Scope of Evaluation in State of New York

Examiners selected the Rochester and Syracuse MSAs for full-scope review, as they represented the largest concentration of deposits and branches in the state of New York. These MSAs accounts for 88.4 percent of the bank's adjusted deposits and 45.4 percent of lending in the state. The Albany, Binghamton, Buffalo, and Ithaca MSAs and non-MSA New York AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Binghamton MSA during the evaluation period to conduct a meaningful analysis. Conclusions for the Lending Test for that AA are based solely on home mortgage and small business lending.

JPMCB did not originate a sufficient volume of small loans to farms in the Ithaca MSA and non-MSA New York AA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for that AA.

There were no low-income geographies in the Ithaca MSA and non-MSA New York AA. All geographic conclusions were based solely on performance in moderate-income geographies.

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 Outstanding. Performance in the limited-scope AAs supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's performance in both the Rochester MSA and Syracuse MSA was excellent.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Rochester MSA	1,716	11,346	218	19	13,299	30.1	58.7
Syracuse MSA	1,283	5,304	141	11	6,739	15.3	29.5
Limited-Scope							
Albany MSA	1,849	9,031	122	5	11,007	24.9	4.6
Binghamton MSA	417	954	13	3	1,387	3.1	0.6
Buffalo MSA	1,299	7,687	87	1	9,074	20.6	1.4
Ithaca MSA	94	808	42	1	945	2.1	1.6
Non-MSA NY	346	1284	35	1	1,666	3.8	3.6
Broader Statewide/Regional Area							
Direct Benefit				9	9	0.0	
Indirect Benefit				23	23	0.1	
Total	7,004	36,414	658	73	44,149	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Rochester MSA	313,971	181,097	3,227	82,875	581,170	25.7	58.7
Syracuse MSA	222,133	119,433	1,391	37,244	380,201	16.8	29.5
Limited-Scope							
Albany MSA	444,588	103,203	1,177	20,350	569,318	25.1	4.6
Binghamton MSA	61,407	10,356	144	14,333	86,240	3.8	0.6
Buffalo MSA	268,021	86,342	693	9,913	364,969	16.1	1.4

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Ithaca MSA	25,556	9,542	400	16,915	52,413	2.3	1.6
Non-MSA NY	88,942	20,473	339	8	109,762	4.8	3.6
Broader Statewide/Regional Area							
Direct Benefit				21,664	21,664	1.0	
Indirect Benefit				99,601	99,601	4.4	
Total	1,424,618	530,446	7,371	302,903	2,265,338	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Rochester MSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 16.6 percent. The bank ranked third among 17 depository financial institutions, placing it in the top 18 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of one percent based on the number of home mortgage loans originated or purchased. The bank ranked 22nd among 230 home mortgage lenders in the AA, which placed it in the top 10 percent of lenders. The top three lenders were ESL Federal Credit Union (24.2 percent), Premium Mortgage Corporation (9.8 percent), and Hometown Funding (5.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 84 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (24.2 percent), Capital One (7.8 percent), and Canandaigua National Bank (7.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 25.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 13 small farm lenders in the AA. The other top lenders were John Deere Financial (15.3 percent), Community Bank, N.A. (13.6 percent), and Wayne Bank (9 percent).

Syracuse MSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 11.4 percent. The bank ranked third among 15 depository financial institutions, placing it in the top 20 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 22nd among 224 home mortgage lenders in the AA, which placed it in the top 10 percent of lenders. The top three lenders were Empower Federal Credit Union (19.9 percent), Americu Credit Union (7.6 percent), and Rocket Mortgage (5.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 13.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 86 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (23.7 percent), Capital One (7.1 percent), and Synchrony Bank (7 percent).

In overall small loans to farms for 2022, the bank had a market share of 22.3 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 16 small farm lenders in the AA. The other top lenders were KeyBank, N.A. (18 percent), John Deere Financial (16 percent), and NBT Bank, N.A. (8.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in the Rochester MSA and good geographic distribution in the Syracuse MSA.

Home Mortgage Loans

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

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded the percentage of owner-occupied homes in those geographies and approximated the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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.

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and near to the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies approximated the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the 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.

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not make any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and was well below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was excellent.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes in the Rochester MSA and Syracuse MSA.

Home Mortgage Loans

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

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The percentage of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to low-income borrowers.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The

percentage of loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the 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 farms.

Rochester MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of loans to farms with revenues of \$1 million or less.

Syracuse MSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of loans to farms with revenues of \$1 million or less.

Community Development Lending

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Rochester MSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 19 CD loans totaling \$82.9 million, which represented 24 percent of the allocated tier 1 capital. By dollar volume, 70.7 percent of these loans funded affordable housing, 28.4 percent funded revitalization and stabilization efforts, 0.7 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made 14 PPP loans totaling \$23.7 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$19.8 million construction loan to finance the acquisition and construction of a mixed-use development. The property will consist of 2,600 square feet of commercial space and 76 units of affordable and supportive housing restricted to 70 percent or less of the AMI.
- A \$15.2 million construction loan to finance the new construction of 72 units of affordable housing. All units will be affordable to households earning at or below 70 percent of the AMI. Eleven units will be set-aside for households where at least one household member has a physical disability.

Syracuse MSA

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

The bank made 11 CD loans totaling \$37.2 million, which represented 21.3 percent of the allocated tier 1 capital. By dollar volume, 52.6 percent of these loans funded affordable housing, 47.1 percent funded revitalization and stabilization efforts, and 0.4 percent funded economic development. Of the total CD loans, the bank made six PPP loans totaling \$2.6 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$13.1 million bridge loan for the new construction of a mixed-use development that consists of retail and office space and 26 mixed-income apartments. The project qualifies for NMTCs. The development will include a food hall with stalls for start-up restaurant concepts. Of the housing units, 25 percent will be restricted to low-income households and 51 percent will be workforce housing restricted to households earning 60 to 120 percent of the AMI. This project will also create 34 permanent jobs and help retain 40 jobs in an area with a high poverty rate.
- A \$9.8 million construction loan for an apartment complex with 80 units reserved for households earning 60 percent or less of the AMI. Of the units, 40 are supportive housing units targeted to individuals experiencing homelessness or mental illness.

Product Innovation and Flexibility

Rochester MSA

The bank used innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 1,275 loans in the amount of \$145.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	83	9,879
Federal Housing Administration (FHA)	33	4,419
Chase Homebuyer Grant Loans	47	6,680
Homebuyer Education Grants	54	27
Home Lending SPCP	23	2,461
Community Lending Program (Correspondent SPCP)	7	1,127
Veteran's Administration (VA)	5	1,206
VA Purchase Closing Credit	2	398
Business Card SPCP	9	27
Business Banking SPCP	5	285
Small Business Administration (SBA)	7	1,400
Paycheck Protection Program (PPP)	1,000	117,216
Total	1,275	145,125

Syracuse MSA

The bank used innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 821 loans in the amount of \$89.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	59	6,643
Federal Housing Administration (FHA)	32	4,834
Chase Homebuyer Grant Loans	52	6,551
Homebuyer Education Grants	40	20
Home Lending SPCP	5	449
Community Lending Program (Correspondent SPCP)	2	275
Veteran's Administration (VA)	6	1,050
VA Purchase Closing Credit	4	713
Business Card SPCP	6	20
Business Banking SPCP	1	150
Paycheck Protection Program (PPP)	614	68,593
Total	821	89,298

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of New York.

The bank made nine CD loans totaling \$21.7 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$99.6 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Albany MSA, Binghamton MSA, Buffalo MSA, and Ithaca MSA was consistent with the bank's performance in the full-scope areas. Performance in the non-MSA New York AA was weaker than the bank's performance in the full-scope areas due to a lower level of CD lending activity. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

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. Performance in the limited-scope AAs and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Rochester and Syracuse MSAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Rochester MSA	18	45,759	11	61,683	29	14.0	107,441	11.9	0	0
Syracuse MSA	10	30,560	15	58,794	25	12.1	89,354	9.9	0	0
Limited-Scope										
Albany MSA	10	33,735	34	103,400	44	21.3	137,135	15.1	0	0
Binghamton MSA	2	10,261	11	14,229	13	6.3	24,489	2.7	0	0
Buffalo MSA	8	25,559	13	157,192	21	10.1	182,752	20.2	0	0
Ithaca MSA	4	15,377	0	0	4	1.9	15,377	1.7	0	0
Non-MSA NY	3	23,397	0	0	3	1.5	23,397	2.6	0	0
Broader Statewide/Regional Area										
Direct Benefit	5	3,295	25	100,582	30	14.5	103,877	11.5	0	0
Indirect Benefit	24	75,127	14	145,494	38	18.4	220,622	24.4	0	0
Total	84	263,071	123	641,374	207	100.0	904,445	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

Rochester MSA

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 31.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made six grants and donations, totaling \$795,000 to five organizations.

The bank exhibited excellent responsiveness to the credit and community economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.5 percent of investments supported affordable housing and 0.5 percent funded community services to low- and moderate-income individuals.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made four LIHTC investments totaling \$51.6 million that supported 313 affordable housing units and one HTC totaling \$9.3 million.

Qualified investments made during the evaluation period include:

- A \$26.5 million LIHTC investment for the construction of a four-story elevator building containing 150 units targeted to seniors with incomes of 60 percent or less of the AMI. Rental subsidies through various local and state organizations will be available for 120 units.
- A \$150,000 grant to a local community services organization to support their financial coaching program. Professional financial counselors work with low- and moderate-income homeowners to increase their financial success with access to safe and affordable banking services, debt reduction, credit repair/building, increasing cash savings and asset-building.

Syracuse MSA

The bank had an excellent level of qualified CD investments, particularly those that were not routinely provided by private investors, occasionally in a leadership position. The dollar volume of current- and prior-period investments represented 51.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made five grants and donations, totaling \$2.2 million to two organizations.

The bank exhibited excellent responsiveness to the credit and economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 91.9 percent of investments supported affordable housing, 5.9 supported revitalization and stabilization efforts, 2.1 percent funded community services to low- and moderate-income individuals, and 0.2 percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two LIHTC investments totaling \$50.8 million that supported 208 affordable housing units, one NMTC totaling 5.3 million, and seven HTCs totaling \$581,855.

Qualified investments made during the evaluation period include:

A \$37.9 million LIHTC investment in the redevelopment of a historic car factory in a moderate-income geography into an integrated, mixed-use, supportive, workforce housing complex. The development included 128-units housing targeted to low- and moderate-income individuals and families, with 50 units set aside for individuals experiencing homelessness.

Four grants totaling \$2 million to a community services foundation to support programs that remove barriers to economic prosperity for low- and moderate-income persons. The programs help residents gain access to quality jobs, inclusive workplaces, and entrepreneurship opportunities, as well as build vibrant neighborhood business centers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany MSA, Binghamton MSA, Buffalo MSA, Ithaca MSA and the non-MSA New York AA was consistent with the bank's performance in the full-scope areas. Performance in the limited-scope AAs supported the overall Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of New York. The bank made 30 investments totaling \$103.9 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted affordable housing, community services to low- and moderate-income individuals, and economic development.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$220.6 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 2,216 affordable units, NMTCs and HTC's.

SERVICE TEST

The bank's performance under the Service Test in the state of New York is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of New York.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Rochester MSA was good and in the Syracuse MSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Rochester MSA	58.7	23	42.6	4.3	30.4	34.8	30.4	0.0	10.5	18.0	39.7	31.0	0.9
Syracuse MSA	29.5	12	22.2	8.3	8.3	25.0	41.7	16.7	7.4	18.1	42.9	28.3	3.3

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Limited-Scope													
Albany MSA	4.6	9	16.7	0.0	11.1	66.7	11.1	11.1	8.9	14.0	47.5	27.8	1.8
Binghamton MSA	0.6	1	1.9	0.0	0.0	0.0	100.0	0.0	4.8	20.6	42.5	30.6	1.5
Buffalo MSA	1.4	6	11.1	16.7	0.0	50.0	33.3	0.0	12.5	15.3	40.5	29.9	1.8
Ithaca MSA	1.6	1	1.9	0.0	0.0	0.0	0.0	100.0	0.0	11.0	55.5	22.6	10.9
Non-MSA NY	3.6	2	3.7	0.0	0.0	50.0	50.0	0.0	0.0	17.4	53.7	27.4	1.5
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

Rochester MSA

The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered six branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which one was within 1,000 feet of a moderate-income geography. In addition, JPMCB branches in the Rochester CSA included three Community Branches, of which one was in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 47 deposit-taking ATMs in the AA, of which 6.4 percent were in low-income geographies and 29.8 percent were in moderate-income geographies. JPMCB provided data indicating that during the evaluation period customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Syracuse MSA

The bank's distribution of branches in low-income geographies was exceeded and in moderate-income geographies was well below the percentage of the population living within those geographies. This MSA was impacted with a net loss of two moderate-income branches due to new income designations following 2020 Census. Prior to the Census changes, branch distribution exceeded the population demographics. Examiners further considered three branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of a low- or moderate-income geography. In addition, JPMCB branches in the Syracuse CSA included three Community Branches, of which one was in a low-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 27 deposit taking ATMs in the AA, of which 7.4 percent were in low-income geographies and 3.7 percent were in moderate-income geographies. Bank provided data indicating that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Rochester MSA	1	1	0	0	0	1	-1
Syracuse MSA	1	2	0	0	-2	1	0
Limited-Scope							
Albany MSA	6	0	0	0	4	2	0
Binghamton MSA	1	0	0	0	0	1	0
Buffalo MSA	6	0	1	0	3	2	0
Ithaca MSA	0	0	0	0	0	0	0
Non-MSA NY	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

Rochester MSA

To the extent changes have been made, 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 one branch, which was not in a low- or moderate-income geography. The bank closed one branch, which was also not in a low- or moderate-income geography. The branch closure was the result of consolidation.

Services, including where appropriate, business hours did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were 17 locations with drive-thru facilities operating under similar hours.

Syracuse MSA

To the extent changes have been made, 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 one branch, which was not in a low- or moderate-income geography. The bank closed two branches, which were also not in low- or moderate-income geographies. The branch closures were the result of consolidation.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturdays. There were seven locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Rochester MSA and Syracuse MSA.

Rochester MSA

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 580 qualified CD service activities to 34 organizations, for a total of 1,192 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 224 hours participating on boards and committees for four different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, homebuyer education, and financial literacy.

Service activities during the evaluation period include:

- A JPMCB employee served on the board of a nonprofit organization that provides a fun, safe, and affordable place for kids to connect with others and engage in after school programs.
- JPMCB partnered with several CCAs and provided tailored credit counseling and debt education to 339 low- and moderate-income individuals. The bank supported budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Syracuse MSA

Bank records show that during the evaluation period, employees provided their financial or job-specific expertise and/or technical assistance for 278 qualified CD service activities to 22 organizations, for a total of 1,036 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 489 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy, and homebuyer education.

Service activities during the evaluation period include:

- JPMCB partnered with several CCAs and provided tailored credit counseling and debt education to 179 low- and moderate-income individuals. These services were responsive to the need to improve financial health for underserved populations.

- JPMCB employees partnered with a local nonprofit to deliver financial education workshops at a school with a below state average graduation rate, to at-risk youth, and students living in low- and moderate-income communities. The nonprofit serves 1,052 students in grades 9 through 12.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Albany MSA, Binghamton MSA, Buffalo MSA, Ithaca MSA, and non-MSA New York AA was consistent with the bank's performance in the full-scope areas. Performance in the limited-scope AAs supported the overall Service Test conclusion.

State of North Carolina

CRA Rating for the State of North Carolina: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of North Carolina

Examiners assessed performance in two AAs in the state of North Carolina rating area. These were comprised of a portion of the Raleigh-Durham-Cary, NC (Raleigh) CSA and the entire Greenville, NC (Greenville) MSA. The bank entered the Greensboro-Winston-Salem-High Point, NC CSA AA after July 1, 2023. Examiners did not review performance in this AA as there was not enough activity to conduct a meaningful analysis. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of North Carolina is JPMCB's 30th largest rating area. As of June 30, 2023, the bank had approximately \$1.1 billion in deposits in the state of North Carolina rating area, of which approximately \$1 billion represent retail branch deposits. As of December 31, 2023, the bank operated 16 branches and 51 deposit taking ATMs in the rating area, representing 0.3 percent of total branches and 0.3 percent of total ATMs. The bank originated and purchased approximately \$2.3 billion in loans or 0.4 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 88 banks operating 2,003 branches in the state rating area. JPMCB ranked 21st in deposit market share with 0.3 percent. Primary competitors include Bank of America with 41.3 percent deposit market share, Truist Bank with 19.5 percent, and First Citizens Bank & Trust Company with 11 percent.

Raleigh CSA

The Raleigh CSA AA consists of Chatham, Durham, Orange, and Wake counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 36 banks operating 321 branches in the AA. JPMCB operated 15 branches in the AA and was ranked 11th in deposit market share with 1.1 percent. Primary competitors include First-Citizens Bank & Trust Company with 48.3 percent deposit market share, Wells Fargo Bank with 11.4 percent, and Truist Bank with 10.1 percent. As of December 31, 2023, the bank operated 49 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Raleigh CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Raleigh CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	288	8.0	19.8	29.2	40.6	2.4
Population by Geography	1,470,911	7.0	21.9	31.9	38.4	0.8
Housing Units by Geography	604,427	6.8	21.4	33.1	38.6	0.0
Owner-Occupied Units by Geography	348,449	2.4	17.2	34.9	45.5	0.0
Occupied Rental Units by Geography	210,998	13.5	28.0	30.1	28.3	0.1
Vacant Units by Geography	44,980	9.9	23.2	33.6	33.2	0.0
Businesses by Geography	189,338	4.7	18.5	32.1	44.2	0.6
Farms by Geography	4,362	3.0	16.0	44.6	36.4	0.1
Family Distribution by Income Level	361,843	20.7	16.2	18.4	44.7	0.0
Household Distribution by Income Level	559,447	22.1	16.1	17.5	44.4	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$68,020	Median Housing Value			\$239,610
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$78,057	Median Gross Rent			\$943
			Families Below Poverty Level			8.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Raleigh CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	359	8.1	17.5	32.0	39.0	3.3
Population by Geography	1,679,224	7.6	17.2	34.0	39.3	1.9
Housing Units by Geography	672,939	7.5	17.7	34.8	38.7	1.3
Owner-Occupied Units by Geography	391,378	3.4	15.1	35.4	45.3	0.9

Table A – Demographic Information of the Assessment Area Assessment Area: Raleigh CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	232,428	13.7	22.0	34.2	28.3	1.8
Vacant Units by Geography	49,133	10.7	18.5	32.8	36.2	1.8
Businesses by Geography	291,911	5.6	16.2	34.3	42.6	1.4
Farms by Geography	6,455	6.0	16.5	39.5	36.8	1.2
Family Distribution by Income Level	399,173	20.3	15.7	19.7	44.3	0.0
Household Distribution by Income Level	623,806	22.0	16.2	17.5	44.3	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$84,764	Median Housing Value			\$296,173
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$96,929	Median Gross Rent			\$1,181
			Families Below Poverty Level			6.3%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Raleigh CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Raleigh CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Raleigh CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$850 to \$976 according to 2015 ACS data and from \$1,060 to \$1,212 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,360 to \$1,561 according to 2015 ACS data and ranging from \$1,695 to \$1,939 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Raleigh CSA would be \$1,286 using 2015 ACS data and \$1,590 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 56.8 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Raleigh MSA and by 56.6 percent in the Durham MSA. This acceleration in home prices creates new affordability concerns in the Raleigh CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Raleigh CSA, 8.8 percent of families had incomes below the FPL according to the 2015 ACS and 6.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Raleigh CSA was 3 percent compared to the state of North Carolina at 3.2 percent and the national unemployment rate of 3.5 percent.

Economic Data

The expansion of payrolls in the Raleigh area relative to pre-pandemic highs ranked 10th among metro areas nationally and job growth continued to outpace the state and nation. Nearly all industries were growing at an above-average rate with construction, professional/business services, and healthcare posting particularly strong gains. The job market in the area was strong, while the unemployment rate has remained well below average. The economic performance of the Durham portion of the AA was closely linked to Duke University and its health system. The local university and its healthcare facilities attracted a strong talent pool and helped support growth in tech and other knowledge-based industries. The housing market was strong and house prices far outpaced state and national averages due to high demand. The area's strengths included low business and living costs compared with other tech hubs, high per capita income that supports consumption, strong and improving net migration, very high economic vitality, and a high concentration of prime-age workers. Weaknesses included strained infrastructure, high employment volatility, and low-industrial diversity.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations serving the area. These organizations focus on affordable housing, economic development and small business, and workforce development. Contacts noted that many disadvantaged small businesses turned to FinTech lenders during the pandemic because they could not qualify for traditional bank loans. There was a need for greater financial and technical assistance support for small businesses. Other needs identified include:

- Credit for smaller builders and homeowners looking to add Accessory Dwelling Units
- Support for affordable housing development
- Down payment assistance
- Technical and capacity building assistance for small businesses
- Increased grant funding for area nonprofits

Scope of Evaluation in State of North Carolina

Examiners selected the Raleigh CSA for full-scope review, as it represented the largest concentration of deposits, branches, and lending in the state of North Carolina. The CSA accounts for 99.1 percent of the bank's adjusted deposits and 96.9 percent of lending in the state. The Greenville MSA received a limited-scope review. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Greenville MSA during the evaluation period to conduct a meaningful analysis. Conclusions for the Lending Test for that AA are based solely on home mortgage and small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN STATE OF NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in the state of North Carolina is rated Outstanding. Performance in the limited-scope AA supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Raleigh CSA	5,498	23,162	199	2	28,861	96.9	99.2
Limited-Scope							
Greenville MSA	154	749	27	0	930	3.1	0.8
Broader Statewide/Regional Area							
Indirect Benefit				3	3	0.0	
Total	5,679	24,124	235	5	30,043	100.0	100.00
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Raleigh CSA	1,989,880	266,750	1,993	8,796	2,267,419	97.1	99.2
Limited-Scope							
Greenville MSA	33,026	10,678	242	0	43,946	1.9	0.8
Broader Statewide/Regional Area							
Indirect Benefit				22,754	22,754	1.0	
Total	2,022,906	277,428	2,235	31,550	2,334,119	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.1 percent. The bank ranked 11th among 36 depository financial institutions, placing it in the top 31 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.9 percent based on the number of home mortgage loans originated or purchased. The bank ranked 21st among 697 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were State Employee's

Credit Union (14.5 percent), Coastal Federal Credit Union (6.6 percent), and Rocket Mortgage (5.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 14.6 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 128 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (26.2 percent), Bank of America (9.1 percent), and Capital One (6.8 percent).

In overall small loans to farms for 2022, the bank had a market share of 20.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 23 small farm lenders in the AA. The other top lenders were John Deere Financial (17.5 percent), The Fidelity Bank (14.9 percent), and Wells Fargo Bank (11.3 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the State of North Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the State of North Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the State of North Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in those geographies but was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the State of North Carolina 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was near to the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$8.8 million, which represented 8.2 percent of the allocated tier 1 capital. By dollar volume, 99.4 percent of these loans funded affordable housing, and 0.6 percent funded revitalization and stabilization efforts. Of the total CD loans, one was a PPP loan totaling \$54,565 to provide relief for an organization due to the COVID-19 pandemic.

CD loans made during the evaluation period included an \$8.7 million construction loan to a nonprofit corporation for the development of a 51-unit LIHTC housing project. Of the 51 units, 30 are restricted to households earning 60 percent or less of the AMI, eight units are restricted to households earning 50 percent or less of the AMI, 13 units are restricted to households earning 30 percent or less of the AMI. Six units are designated for persons experiencing homelessness or disability.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 635 loans in the amount of \$136.8 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	86	18,117
Federal Housing Administration (FHA)	11	2,825
Chase Homebuyer Grant Loans	105	33,529
Homebuyer Education Grants	33	17
Home Lending SPCP	26	7,841
Community Lending Program (Correspondent SPCP)	181	56,917
Veteran's Administration (VA)	5	2,156
VA Purchase Closing Credit	2	930
Business Card SPCP	43	172
Business Banking SPCP	8	475
Paycheck Protection Program (PPP)	135	13,852
Total	635	136,831

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of North Carolina.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$22.8 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These loans included a PPP loan and two loans supporting affordable housing efforts.

Conclusions for Area Receiving a Limited-Scope Review

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

Refer to Tables O through T in the state of North Carolina 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 North Carolina is rated Outstanding. Performance in the limited-scope AA and investments in the broader statewide or regional areas supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 50.1 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Raleigh CSA	8	12,392	7	41,317	15	22.4	53,709	38.4	0	0
Limited-Scope										
Greenville MSA	2	411	2	3,994	4	6.0	4,405	3.2	0	0
Broader Statewide/Regional Area										
Direct Benefit	1	468	8	6,332	9	13.4	6,800	4.9	0	0
Indirect Benefit	17	7,454	22	67,422	39	58.2	74,877	53.6	0	0
Total	28	20,725	39	119,066	67	100.0	139,791	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 81.4 percent of investments supported affordable housing and 18.6 percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made six LIHTC investments totaling \$31.3 million that supported 735 affordable housing units.

Qualified investments made during the evaluation period include:

- A \$10 million equity investment in an MDI that is also a CDFI. The investment was used for loan capacity growth, implementation of technology upgrades, talent acquisition, and business expansion. The CDFI provides financial services with particular emphasis on the financial needs of underserved populations and geographies.
- A \$6.1 million LIHTC investment in an affordable housing development. The project created 100 units of two- and three-bedroom apartment homes targeted to low- and moderate-income individuals earning 60 percent or less of AMI.

Conclusions for Area Receiving a Limited-Scope Review

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

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of North Carolina. The bank made nine investments totaling \$6.8 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments included LIHTC investments supporting 357 affordable housing units and community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$74.9 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 2,989 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of North Carolina is rated Outstanding. Performance in the Greenville MSA limited-scope AA had a neutral impact on the Service Test conclusion for the state of North Carolina.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Raleigh CSA	99.2	15	93.8	13.3	6.7	33.3	46.7	0.0	7.6	17.2	34.0	39.3	1.9

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Limited-Scope													
Greenville MSA	0.8	1	6.3	0.0	0.0	0.0	0.0	100.0	4.3	15.6	47.1	27.0	6.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was well below the percentage of the population living within those geographies. Examiners further considered five branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 49 deposit-taking ATMs in the AA, of which 14.3 percent were in low-income geographies and 8.2 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Raleigh CSA	14	0	1	2	3	8	0
Limited-Scope							
Greenville MSA	1	0	0	0	0	0	1
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing 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 opened 14 branches, of which one was in a low-income geography and two were in moderate-income geographies. The bank did not close any branches in the AA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch

locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Raleigh CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 682 qualified CD service activities to 23 organizations, for a total of 1,219 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by three bank employees spending over 44 hours participating on boards and committees for two different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and debt education and pre-purchase homebuyer education.

Service activities during the evaluation period include:

- JPMCB partnered with 16 CCAs that provided 453 individuals with credit counseling and debt education, through partnership with nonprofit CCAs. The bank supported budget, debt management, housing, student loan, and bankruptcy counseling, and financial education.
- A bank employee served on the board of a nonprofit, which has a mission to close the wealth gap in the state by ensuring that everyone has a pathway to prosperity. The organization collaborates with local financial institutions to offer services and educational resources that help empower people and families to improve their financial capability, health, and independence.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Greenville MSA was weaker than the bank's performance in the Raleigh CSA due to lower percentages of branch distributions in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in the limited-scope AA did not impact the Service Test conclusion for the state of North Carolina.

State of North Dakota

CRA Rating for the State of North Dakota: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments and grants that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

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

Examiners assessed performance in a single AA in the state of North Dakota rating area. This AA was comprised of a portion of the Fargo, ND-MN (Fargo) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of North Dakota is JPMCB's 55th largest rating area. As of June 30, 2023, the bank had approximately \$38.1 million in deposits in the state of North Dakota rating area, of which approximately \$33.4 million represent retail branch deposits. As of December 31, 2023, the bank operated three branches and 12 deposit taking ATMs in the rating area, representing less than 0.1 percent of total branches and less than 0.1 percent of total ATMs. The bank originated and purchased approximately \$81 million in loans or less than 0.1 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 74 banks operating 411 branches in the state rating area. JPMCB ranked 69th in deposit market share with 0.1 percent. Primary competitors include Bell Bank with 12.4 percent deposit market share, First International Bank & Trust with 8.6 percent, and Gate City Bank with 6.7 percent.

The Fargo MSA AA consists of Cass County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 28 banks operating 77 branches in the AA. JPMCB operated three branches in the AA and was ranked 21st in deposit market share with 0.3 percent. Primary competitors include Bell Bank with 40.5 percent deposit market share, First International Bank & Trust with 7.7 percent, and

Gate City Bank with 7.1 percent. As of December 31, 2023, the bank operated 12 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Fargo MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Fargo MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	27.3	45.5	24.2	3.0
Population by Geography	162,500	0.0	23.7	34.8	39.6	1.9
Housing Units by Geography	73,190	0.0	26.8	36.4	34.5	2.2
Owner-Occupied Units by Geography	35,858	0.0	16.6	40.1	42.5	0.8
Occupied Rental Units by Geography	32,918	0.0	38.7	31.8	26.3	3.1
Vacant Units by Geography	4,414	0.0	21.4	41.1	31.4	6.0
Businesses by Geography	19,101	0.0	31.9	27.3	40.2	0.6
Farms by Geography	694	0.0	12.0	55.0	32.9	0.1
Family Distribution by Income Level	38,056	18.4	19.5	21.9	40.2	0.0
Household Distribution by Income Level	68,776	23.1	18.2	17.3	41.4	0.0
Median Family Income MSA - 22020 Fargo, ND-MN MSA		\$75,010	Median Housing Value			\$167,249
			Median Gross Rent			\$708
			Families Below Poverty Level			6.5%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Fargo MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	9.1	20.5	40.9	29.5	0.0
Population by Geography	184,525	6.3	18.6	42.4	32.6	0.0
Housing Units by Geography	83,604	8.6	23.4	43.8	24.2	0.0
Owner-Occupied Units by Geography	40,437	1.9	13.2	49.0	35.9	0.0
Occupied Rental Units by Geography	36,590	13.8	33.6	39.0	13.6	0.0
Vacant Units by Geography	6,577	21.2	29.7	37.9	11.2	0.0
Businesses by Geography	26,387	10.8	23.2	38.4	27.5	0.0
Farms by Geography	854	3.9	9.5	58.8	27.9	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Fargo MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	43,034	18.4	18.5	22.7	40.4	0.0
Household Distribution by Income Level	77,027	23.1	16.1	19.1	41.7	0.0
Median Family Income MSA - 22020 Fargo, ND-MN MSA		\$90,450	Median Housing Value			\$230,391
			Median Gross Rent			\$830
			Families Below Poverty Level			6.0%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Fargo MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Fargo MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2020 Census data.

In the Fargo MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$938 according to 2015 ACS data and \$1,131 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,500 according to 2015 ACS data and \$1,809 according to 2020 Census data. The monthly mortgage payment for the median home in the Fargo MSA would be \$898 using 2015 ACS data and \$1,237 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 29.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Fargo MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Fargo MSA, 6.5 percent of families had incomes below the FPL according to the 2015 ACS and 6 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Fargo MSA was 1.7 percent compared to the state of North Dakota at 1.7 percent and the national unemployment rate of 3.5 percent.

Economic Data

Fargo's labor market was habitually tight, with an unemployment rate consistently lower than the nation's. The metro area often had a high number of unfilled positions per unemployed worker, a sign that employers frequently could not find enough new workers. Losses in construction were larger than in other industries. Employment in the outsized wholesale trade industry was rising, but recent gains had only offset losses from earlier in the year. Labor force growth had stalled out. Fargo served as a hub for aggregating and exporting crops across the northern border, however, this economic driver had been struggling. Employment in the shipping industry had been steadily sliding since mid-2022. The slowdown in house price appreciation was not as pronounced as it was nationally. The area's strengths included favorable demographics, including a well-educated workforce and fast population growth, relatively low business costs, and high housing affordability. Weaknesses included structurally low unemployment that leaves job gains dependent upon labor force growth, and exposure to volatility in agricultural prices.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on small business, agricultural programming, and real estate services. Contacts noted that the overall economy in the area is strong, and that the area is not typically affected by economic downturns. While some business sectors, such as retail and restaurants were impacted by the COVID-19 pandemic, many businesses were able to reopen without too much disruption. The area had a very low unemployment rate, which led to a shortage of workers. The area was also experiencing a growing population leading to an increased demand for housing and low vacancy rates. The average sales price of homes for sale was increasing, with an increase in the number of buyers making cash offers rather than obtaining financing. Affordable housing was a need in the area and was difficult to find in the metro area. Typically, borrowers could find more affordable options outside the cities of Fargo, West Fargo, and Moorhead. Other needs identified included asset-building programming, access to affordable childcare, and workforce development training for low-income and new American citizens.

Scope of Evaluation in State of North Dakota

Examiners selected the Fargo MSA for full-scope review. There were no other AAs within the state of North Dakota. Refer to the table in appendix A for more information.

There were no low-income geographies in the Fargo MSA during the 2020-2021 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies during this analysis period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH DAKOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Fargo MSA	214	1,702	63	0	1,979	100.0	100.0
Total	214	1,702	63	0	1,979	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Fargo MSA	58,495	21,528	760	0	80,783	100.0	100.0
Total	58,495	21,528	760	0	80,783	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.3 percent. The bank ranked 21st among 28 depository financial institutions, placing it in the top 75 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 35th among 151 home mortgage lenders in the AA, which placed it in the top 24 percent of lenders. The top three lenders were Gate City Bank (21.1 percent), Bell Bank (13.3 percent), and First International Bank and Trust (6.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 10.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked third among 48 small business lenders in the AA, which placed it in the top 7 percent of lenders. The other top lenders were American Express (15.5 percent), U.S. Bank (14.6 percent), and Bell Bank (9.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 7 percent based on the number of small loans to farms originated or purchased. The bank ranked sixth among 15 small farm lenders in the AA, which placed it in the top 40 percent of lenders. The top three lenders were John Deere Financial (29.2 percent), Bremer Bank, N.A. (14 percent), and U.S. Bank (12.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA. During the 2020 through 2021 analysis period, there were no low-income geographies in the bank's AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans in moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in those geographies and approximated the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the State of North Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to the bank not making any small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the State of North Dakota 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to farms with revenues of \$1 million or less.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Fargo MSA. This had a neutral impact on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 11 loans in the amount of \$2.9 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	3	439
Federal Housing Administration (FHA)	1	327
Chase Homebuyer Grant Loans	2	358
Homebuyer Education Grants	2	1
Veteran's Administration (VA)	1	338
Business Card SPCP	1	3
Paycheck Protection Program (PPP)	1	1,469
Total	11	2,934

INVESTMENT TEST

The bank's performance under the Investment Test in the state of North Dakota is rated Outstanding. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had 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 dollar volume of current- and prior-period investments represented 242.5 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants totaling \$11,300 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Fargo MSA	1	2,731	6	5,635	7	35.0	8,366	42.6	0	0
Broader Statewide/Regional Area										
Indirect Benefit	10	8,530	3	2,721	13	65.0	11,251	57.4	0	0
Total	11	11,261	9	8,356	20	100.0	19,617	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.9 percent of investments supported affordable housing and 0.1 percent funded community services to low- and moderate-income individuals.

The bank occasionally used innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two LIHTC investments totaling \$4.8 million that supported 88 affordable units.

Qualified investments made during the evaluation period include:

- Two LIHTC investments totaling \$4.8 million to construct 88 units of affordable housing. The developments contain one- and two-bedroom apartments specifically targeted to low- and moderate-income individuals aged 55 or older.
- An \$8,800 grant to the local chapter of a nationwide nonprofit organization. The organization provides shelter, housing, and other supported services. The organization provides supportive services to over 300 adults and children daily. All participants earn 50 percent or less of the AMI.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of North Dakota. Because JPMCB was responsive to CD needs and opportunities in its AA, examiners considered \$11.3 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included LIHTCs that supported 668 affordable units.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Fargo MSA	100.0	3	100.0	33.3	66.7	0.0	0.0	0.0	6.3	18.6	42.4	32.6	0.0
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank operated three branches, all of which were in low- and moderate-income geographies. The bank's distribution of branches in low-income and in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 12 deposit-taking ATMs in the AA, of which 25 percent were in low-income geographies and 66.7 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Fargo MSA	3	0	0	3	0	0	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened three branches, all of which were in moderate-income geographies. The bank closed no branches in the AA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Fargo MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 74 qualified CD service activities to 17 organizations, for a total of 81 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and debt education, pre-purchase homebuyer education, and technical assistance and capacity building.

Service activities during the evaluation period include:

- JPMCB partnered with 13 CCAs and assisted 58 individuals with credit counseling and debt education. JPMCB employees assisted in providing budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.
- A bank employee served on the Board of a nonprofit, whose mission was to close the wealth gap in the state. The organization offered services to combat violence and homelessness, including emergency shelter, supportive housing, and employment and health services.

State of Ohio

CRA Rating for the State of Ohio²⁶: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made an adequate level of CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated good responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Ohio

Examiners assessed performance in nine AAs in the state of Ohio rating area. These were comprised of a majority of the Columbus-Marion-Zanesville, OH (Columbus) CSA, Cleveland-Akron-Canton, OH (Cleveland) CSA, Dayton-Springfield-Kettering, OH (Dayton) CSA, Lima-Van Wert-Celina, OH (Lima) CSA, Mansfield-Ashland-Bucyrus, OH (Mansfield) CSA, and Youngstown-Warren, OH-PA (Youngstown) CSA, portions of the Toledo-Findlay-Tiffin, OH (Toledo) CSA and Weirton-Steubenville, WV-OH (Weirton) MSA, and four counties in the non-MSA Ohio AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Ohio is JPMCB's eighth largest rating area. As of June 30, 2023, the bank had approximately \$43.4 billion in deposits in the state of Ohio rating area, of which approximately \$40.9 billion represent retail branch deposits. As of December 31, 2023, the bank operated 196 branches and 462 deposit taking ATMs in the rating area, representing 4 percent of total branches and 3 percent of total ATMs. The bank originated and purchased approximately \$9.7 billion in loans, or 1.5 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 199 banks operating 3,106 branches in the state rating area. JPMCB ranked fifth in deposit market share with 8.5 percent. Primary competitors include U.S. Bank with 20.3 percent deposit market share, The Huntington National Bank with 15.2 percent, and Fifth Third Bank with 13.1 percent.

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.

Columbus CSA

The Columbus CSA AA consists of Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Marion, Morrow, Muskingum, Perry, Pickaway, and Union counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 56 banks operating 524 branches in the AA. JPMCB operated 63 branches in the AA and was ranked second in deposit market share with 24 percent. Primary competitors include The Huntington National Bank with 39.3 percent deposit market share, PNC Bank with 7.2 percent, and Fifth Third Bank with 6.6 percent. As of December 31, 2023, the bank operated 179 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Columbus CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Columbus CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	470	14.9	24.7	33.4	26.0	1.1
Population by Geography	2,124,334	9.9	22.2	36.3	30.5	1.0
Housing Units by Geography	899,853	11.5	23.5	36.0	28.9	0.2
Owner-Occupied Units by Geography	504,987	5.2	18.7	39.2	36.8	0.0
Occupied Rental Units by Geography	310,272	17.6	30.0	32.6	19.5	0.4
Vacant Units by Geography	84,594	26.4	27.8	29.4	16.0	0.5
Businesses by Geography	159,420	9.1	18.1	31.9	40.4	0.5
Farms by Geography	5,166	4.6	14.7	47.4	33.2	0.1
Family Distribution by Income Level	520,486	22.5	17.2	19.7	40.7	0.0
Household Distribution by Income Level	815,259	24.4	16.5	17.3	41.9	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$156,133
Median Family Income Non-MSAs - OH		\$55,785	Median Gross Rent			\$828
			Families Below Poverty Level			10.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% * The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Columbus CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	555	11.7	24.3	34.8	27.4	1.8
Population by Geography	2,290,695	8.9	21.8	36.2	31.6	1.5
Housing Units by Geography	935,234	9.7	23.4	37.2	28.9	0.8

Table A – Demographic Information of the Assessment Area Assessment Area: Columbus CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	537,975	4.5	18.8	40.1	36.4	0.2
Occupied Rental Units by Geography	326,067	16.2	29.8	33.4	19.0	1.6
Vacant Units by Geography	71,192	19.1	29.0	32.8	17.0	2.1
Businesses by Geography	363,856	7.9	16.9	35.0	39.0	1.1
Farms by Geography	9,490	4.3	17.4	43.3	34.6	0.4
Family Distribution by Income Level	546,890	21.8	17.7	20.6	40.0	0.0
Household Distribution by Income Level	864,042	23.6	16.6	18.2	41.6	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$84,088	Median Housing Value			\$192,200
Median Family Income Non-MSAs - OH		\$66,684	Median Gross Rent			\$979
			Families Below Poverty Level			8.9%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Columbus CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Columbus CSA, some low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Columbus CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$697 to \$881 according to 2015 ACS data and from \$834 to \$1,051 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,116 to \$1,409 according to 2015 ACS data and ranging from \$1,334 to \$1,682 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Columbus CSA would be \$838 using 2015 ACS data and \$1,032 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Columbus CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Columbus CSA, 10.8 percent of families had incomes below the FPL

according to the 2015 ACS and 8.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Columbus CSA 2.7 percent compared to the state of Ohio at 3.1 percent and the national unemployment rate of 3.5 percent.

Economic Data

The labor market in the Columbus area leveled off with total employment declining slightly. Transportation/warehousing were the major sore spot, but payrolls in industries ranged from finance and professional/business services to manufacturing pulled back slightly. While the jobless rate continued to hover below its pre-pandemic norm, the labor force in the area contracted modestly in the second half of 2023. Major firms such as JPMorgan Chase, U.S. Bank, and Nationwide had large footprints in Columbus, making the metro area a hub for banking and insurance. The metro area's population grew at nearly double the national rate in 2022. This marked a continuation of outperformance that dated back decades. Other area strengths included a highly educated workforce, low costs of living and doing business, and strong prospects in high tech and other knowledge-based industries. Weaknesses included homebuilding that is well below its peak pace.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on social services, economic development, housing, and community development. Contacts noted that prior to the pandemic the City of Columbus was experiencing strong revitalization in the downtown area, however, this activity slowed during and after the COVID-19 pandemic. Housing inventory was low, especially the supply of affordable for sale housing, and many homebuyers are being outbid on properties by local investors. Several portions of the AA had older housing stock that needs rehabilitation. Other needs identified in the community included financial coaching, affordable housing, small dollar consumer lending, financing for affordable rental housing, mortgage programs for low- and moderate-income borrowers, and support for small businesses.

Scope of Evaluation in State of Ohio

Examiners selected the Columbus CSA for full-scope review, as it represented the largest concentration of deposits and loans by dollar amount in the state of Ohio. The CSA accounts for 59.1 percent of the bank's adjusted deposits and 47.6 percent of lending in the state. The Cleveland, Dayton, Lima, Mansfield, Toledo, and Youngstown CSAs, Weirton MSA, and non-MSA Ohio AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Weirton MSA during the evaluation period to conduct a meaningful analysis. Conclusions for the Lending Test for that AA are based solely on home mortgage and small business lending.

There were no low-income geographies in the non-MSA Ohio AA. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

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. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Columbus CSA	14,792	41,829	625	40	57,286	39.2	59.1
Limited-Scope							
Cleveland CSA	12,202	45,197	549	51	57,999	39.7	24.8
Dayton CSA	2,617	9,400	237	16	12,270	8.4	7.2
Lima CSA	505	1,800	131	3	2,439	1.7	1.8
Mansfield CSA	404	1,597	64	2	2,067	1.4	0.9
Toledo CSA	1,043	3,817	126	3	4,989	3.4	0.9
Weirton MSA	72	310	3	0	385	0.3	0.3
Youngstown CSA	1,478	4,858	134	11	6,481	4.4	3.3
Non-MSA OH	519	1,486	86	4	2,095	1.4	1.7
Broader Statewide/Regional Area							
Indirect Benefit				8	8	0.0	
Total	33,632	110,294	1,955	138	146,019	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Columbus CSA	3,664,046	851,509	8,387	74,628	4,598,570	47.6	59.1
Limited-Scope							
Cleveland CSA	2,367,523	987,367	6,490	159,660	3,521,040	36.4	24.8
Dayton CSA	432,176	199,664	2,494	21,863	656,197	6.8	7.2
Lima CSA	70,223	39,221	1,469	76	110,989	1.1	1.8
Mansfield CSA	51,981	28,746	604	4,950	86,281	0.9	0.9
Toledo CSA	180,422	51,197	1,271	7,878	240,768	2.5	0.9
Weirton MSA	8,377	4,225	10	0	12,612	0.1	0.3
Youngstown CSA	192,693	96,458	1,274	19,864	310,289	3.2	3.3

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Non-MSA OH	69,845	23,299	870	5,528	99,542	1.0	1.7
Broader Statewide/Regional Area							
Indirect Benefit				32,573	32,573	0.3	
Total	7,037,286	2,281,686	22,869	327,020	9,668,861	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 24 percent. The bank ranked second among 56 depository financial institutions, placing it in the top 4 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked eighth among 615 home mortgage lenders in the AA, which placed it in the top 2 percent of lenders. The top three lenders were The Huntington National Bank (10.2 percent), Rocket Mortgage (4.4 percent), and Fifth Third Bank (4.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 25.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 136 small business lenders in the AA. The other top lenders were American Express (20.3 percent), U.S. Bank (8.4 percent), and Capital One (6.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 27.1 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 27 small farm lenders in the AA. The other top lenders were John Deere Financial (21.4 percent), U.S. Bank (13.6 percent), and The Huntington National Bank (6.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to farms with revenues of \$1 million or less.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 40 CD loans totaling \$74.6 million, which represented 3 percent of the allocated tier 1 capital. By dollar volume, 48.6 percent of these loans funded revitalization and stabilization efforts, 26.6 percent funded affordable housing, 24.4 percent funded community services targeted to low- and moderate-income individuals, and 0.4 percent funded economic development. Of the total CD loans, the bank made 33 PPP loans totaling \$34.6 million.

CD loans made during the evaluation period include:

- Two loans totaling \$5.8 million to support the construction of an affordable 45-unit multi-family apartment building and five new single-family homes. The project is eligible for LIHTC and five units are subsidized through the HUD Section 811 Project Rental Assistance program. Units are restricted to households with incomes of 30 to 80 percent of the AMI.
- A \$14 million construction loan to support the development of 100 affordable housing units. This project included multiple funding sources and assembling 16 contiguous parcels of real estate. All units are restricted to seniors with incomes of 30 to 60 percent of the AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 7,127 loans in the amount of \$887.7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	1,017	166,641
Federal Housing Administration (FHA)	109	23,941
Chase Homebuyer Grant Loans	540	113,581
Homebuyer Education Grants	545	273
Home Lending SPCP	161	30,795
Community Lending Program (Correspondent SPCP)	45	10,081

Loan Type	Number of Loans	Dollar Amount (\$000s)
Veteran's Administration (VA)	39	12,353
VA Purchase Closing Credit	13	3,300
Business Card SPCP	59	207
Business Banking SPCP	24	2,432
Small Business Administration (SBA)	57	14,099
Paycheck Protection Program (PPP)	4,518	509,950
Total	7,127	887,653

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Ohio.

Because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$32.6 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These CD loans included four PPP loans that provided relief for organizations due to the COVID-19 pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lima CSA, Weirton MSA, and the Youngstown CSA was consistent with the bank's performance in the full-scope area. Performance in the Cleveland CSA, Dayton CSA, Mansfield CSA, Toledo CSA, and the non-MSA Ohio AA was stronger than the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the overall State rating.

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. Performance in the limited-scope AAs had a neutral impact on, and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.2 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 32 grants and donations, totaling \$9.8 million to 21 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Columbus CSA	91	40,182	117	191,255	208	38.0	231,437	43.9	0	0
Limited-Scope										
Cleveland CSA	103	40,574	29	81,790	132	24.1	122,364	23.2	0	0
Dayton CSA	40	18,960	17	55,668	57	10.4	74,628	14.1	0	0
Lima CSA	4	576	2	2,440	6	1.1	3,016	0.6	0	0
Mansfield CSA	4	2,370	0	0	4	0.7	2,370	0.5	0	0
Toledo CSA	17	6,883	2	6,904	19	3.5	13,786	2.6	0	0
Weirton MSA	0	0	0	0	0	0.0	0	0.0	0	0
Youngstown CSA	8	7,220	11	535	19	3.5	7,755	1.5	0	0
Non-MSA OH	7	7,865	3	7,989	10	1.8	15,853	3.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	6	944	6	1.1	944	0.2	0	0
Indirect Benefit	68	19,321	18	36,342	86	15.7	55,664	10.6	0	0
Total	342	143,951	205	383,866	547	100.0	527,817	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited good responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 93.8 percent of investments supported affordable housing, 3.2 percent supported revitalization and stabilization efforts, 2.5 percent funded community services to low- and moderate-income individuals, and 0.4 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 19 LIHTC investments totaling \$64.6 million that supported 1,612 affordable units and two NMCTs totaling \$4.7 million.

Qualified investments made during the evaluation period include:

- An \$18.6 million LIHTC investment in an apartment complex located in a moderate-income geography. The development included 248 units restricted to individuals and families earning no less than 30 percent and no more than 50 percent of the AMI.
- A \$4.7 million NMTC investment to the local chapter of a nationwide charity organization. The organization provides housing and supportive services to primarily low- and moderate-income families with children with severe medical conditions. The financing allowed for the expansion and renovation of the current facility located in a low-income census tract.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cleveland CSA, Dayton CSA, Toledo CSA, and non-MSA Ohio AA was consistent with the bank's performance in the full-scope area. Performance in the Lima CSA, Mansfield CSA, Weirton MSA, and Youngstown CSAs was weaker than the bank's performance in the full-scope area due to a lower level of total qualified investments. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Ohio. The bank made six investments totaling \$944,301 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$55.7 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 4,281 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of Ohio is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Ohio.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Columbus CSA	59.1	63	32.1	7.9	22.2	22.2	46.0	1.6	8.9	21.8	36.2	31.6	1.5
Limited-Scope													
Cleveland CSA	24.8	75	38.3	2.7	16.0	40.0	40.0	1.3	8.7	17.8	40.2	32.0	1.3

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Dayton CSA	7.2	23	11.7	8.7	17.4	39.1	34.8	0.0	7.7	18.5	41.1	32.1	0.6
Lima CSA	1.8	6	3.1	0.0	16.7	50.0	33.3	0.0	4.5	13.3	45.5	36.7	0.0
Mansfield CSA	0.9	4	2.0	0.0	25.0	50.0	25.0	0.0	6.1	11.6	61.6	17.8	2.8
Toledo CSA	0.9	7	3.6	0.0	28.6	57.1	14.3	0.0	8.5	17.4	34.7	34.9	4.5
Weirton MSA	0.3	1	0.5	0.0	0.0	0.0	100.0	0.0	5.3	9.5	77.4	7.8	0.0
Youngstown CSA	3.3	11	5.6	0.0	18.2	27.3	54.6	0.0	5.5	18.2	55.5	20.1	0.8
Non-MSA OH	1.7	6	3.1	0.0	16.7	50.0	16.7	16.7	2.4	19.3	62.3	10.8	5.2
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low-income geographies was near to and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered 17 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which seven were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Columbus CSA included four Community Branches, of which two were in low-income geographies and one was in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 179 deposit-taking ATMs in the AA, of which 8.9 percent were in low-income geographies and 24 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Columbus CSA	5	13	0	-2	-5	-1	0
Limited-Scope							
Cleveland CSA	7	11	0	0	-6	2	0
Dayton CSA	0	4	0	-1	-3	0	0
Lima CSA	0	1	0	-1	0	0	0
Mansfield CSA	0	0	0	0	0	0	0
Toledo CSA	3	1	0	0	2	0	0

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Weirton MSA	0	0	0	0	0	0	0
Youngstown CSA	0	2	0	0	-2	0	0
Non-MSA OH	0	1	0	-1	0	0	0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							
<i>* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i>							

To the extent changes have been made, 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 five branches, of which one was in a moderate-income geography. The bank closed 13 branches, of which three were in moderate-income geographies. The branch closures were the result of low transaction volume, proximity to another branch, or relocation to a superior location nearby.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were 44 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Columbus CSA.

Bank employees provided their financial or job-specific expertise and/or technical assistance for 4,269 qualified CD service activities to 89 organizations, for a total of 16,280 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by five bank employees dedicating over 439 hours participating on boards and committees for five different organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial capability/literacy training, and pre-purchase homebuyer education.

Service activities during the evaluation period include:

- JPMCB employees assisted 922 individuals at 17 nonprofit organizations as a part of the Technology for Social Good (TFSG) program. The TFSG program aims to bridge the technology resource gap between the corporate and nonprofit sectors, developing sustainable technology solutions for nonprofits, and addressing technology skills gaps through mentorship and education.
- JPMCB partnered with a nonprofit organization to provide training to 378 low- and moderate-income students. The seminars focused on educating youth on entrepreneurship, work readiness, and

financial literacy and develop financial literacy concepts through in-class activities, after-school programs, and workplace experiences.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cleveland CSA, Dayton CSA, and Mansfield CSA was excellent, which was consistent with the bank's performance in the full-scope area. Performance in the Lima CSA, Toledo CSA, Weirton MSA, Youngstown CSA, and non-MSA Ohio was weaker than the bank's performance in the full-scope area due to lower branch distribution percentages in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in limited-scope AAs did not impact the Service Test conclusion for the state of Ohio.

State of Oklahoma

CRA Rating for the State of Oklahoma: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made an adequate level of CD loans.
- An overall significant level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Oklahoma

Examiners assessed performance in three AAs in the state of Oklahoma rating area. These were comprised of portions of the Oklahoma City, OK (Oklahoma City) MSA and Tulsa, OK (Tulsa) MSAs and one county in the non-MSA Oklahoma AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Oklahoma is JPMCB's 21st largest rating area. As of June 30, 2023, the bank had approximately \$5.9 billion in deposits in the state of Oklahoma rating area, of which approximately \$5.4 billion represent retail branch deposits. As of December 31, 2023, the bank operated 26 branches and 62 deposit taking ATMs in the rating area, representing 0.5 percent of total branches and 0.4 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, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 91 banks operating 530 branches in the state rating area. JPMCB ranked fourth in deposit market share with 7.32 percent. Primary competitors include BOKF, N.A. with 20.3 percent deposit market share, Midfirst Bank with 17.3 percent, and Bank of America with 7.6 percent.

Oklahoma City MSA

The Oklahoma City MSA AA consists of Canadian, Cleveland, and Oklahoma counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 67 banks operating 338 branches

in the AA. JPMCB operated 16 branches in the AA and was ranked third in deposit market share with 9.7 percent. Primary competitors include Midfirst Bank with 26.2 percent deposit market share, BOKF, N.A. with 13.2 percent, and Bank of America with 8.6 percent. As of December 31, 2023, the bank operated 41 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Oklahoma City MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Oklahoma City CSA 2020-2021						
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	155,450	4.7	21.5	34.2	36.5	3.0
Farms by Geography	4,079	3.8	17.5	37.9	39.7	1.1
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 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: FS Oklahoma City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	374	7.8	25.9	32.9	28.3	5.1
Population by Geography	1,246,225	6.3	23.5	35.7	32.8	1.7
Housing Units by Geography	506,533	6.7	25.8	36.7	29.2	1.6
Owner-Occupied Units by Geography	286,019	3.9	19.0	37.5	38.5	1.0
Occupied Rental Units by Geography	173,555	10.0	34.5	36.6	16.6	2.4
Vacant Units by Geography	46,959	11.0	34.9	32.7	18.9	2.5
Businesses by Geography	209,276	4.9	21.6	32.6	38.6	2.3
Farms by Geography	5,734	3.7	20.8	32.0	42.3	1.1

Table A – Demographic Information of the Assessment Area Assessment Area: FS Oklahoma City CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Family Distribution by Income Level	290,675	21.3	17.7	20.4	40.7	0.0
Household Distribution by Income Level	459,574	23.7	16.8	18.5	41.0	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$75,170	Median Housing Value			\$166,026
			Median Gross Rent			\$919
			Families Below Poverty Level			9.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Oklahoma City MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Oklahoma City MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Oklahoma City MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$801 according to 2015 ACS data and \$940 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,281 according to 2015 ACS data and \$1,503 according to 2020 Census data. The monthly mortgage payment for the median home in the Oklahoma City MSA would be \$748 using 2015 ACS data and \$891 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 41.3 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Oklahoma City MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Oklahoma City MSA, 11.5 percent of families had incomes below the FPL according to the 2015 ACS and 9.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Oklahoma City MSA was three percent compared to the state of Oklahoma at 3.2 percent and the national unemployment rate of 3.5 percent.

Economic Data

Oklahoma City experienced steady job losses in the first half of 2023 but regained the majority of jobs that were lost. Strength in government, healthcare and construction pushed payroll growth ahead of the

state and national rates. The labor force grew at an above-average rates. Oklahoma's concentration of mining employment ranks in the top 30 for all U.S. metro areas and divisions, but the industry's footprint extended well beyond direct resource extraction as several large energy firms also had their corporate headquarters in the area. The metro area's larger share of high-wage jobs compared with the state, diverse industry composition, and relatively low living costs made it attractive to migrants. Single-family housing prices continued to appreciate and were doing so more slowly than nationally. Strengths included diverse economic drivers beyond energy, low costs, and a large and stable professional/business services cluster. Weaknesses included exposure to boom-and-bust energy cycles, below-average worker productivity, and few high-tech jobs.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on small business, economic development, and community services. Contacts noted that economic conditions in the area have continued to improve since the pandemic. The hospitality industry was hit hard by the pandemic but were recovering. Many new companies were moving to the metro area. While the cost of living was lower than other areas around the country, there was still a need for affordable housing. Mass transit was limited, and the metro area was heavily car dependent. Northeast Oklahoma City was more income challenged, and the area was a food desert. Other needs identified include:

- Small business loans, including loans for start-ups
- Grant funding for local nonprofit organizations
- Individual Development Accounts with matching bank funds to support downpayment assistance for first time homebuyers
- Support for financial education programming

Scope of Evaluation in State of Oklahoma

Examiners selected the Oklahoma City MSA for full-scope review, as it represented the largest concentration of deposits, branches, and lending in the state of Oklahoma. The MSA accounts for 80 percent of the bank's adjusted deposits and 66.1 percent of lending in the state. The Tulsa MSA and non-MSA Oklahoma AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Oklahoma AA during the evaluation period to conduct a meaningful analysis. Conclusions for the Lending Test for that AA are based solely on home mortgage and small business lending.

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 High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Oklahoma City MSA	2,470	19,082	274	14	21,840	66.1	81.4
Limited-Scope							
Tulsa MSA	1,221	9,132	89	7	10,449	31.6	18.1
Non-MSA OK	150	600	25	0	775	2.3	0.5
Total	3,841	28,814	388	21	33,064	100.0%	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Oklahoma City MSA	528,350	268,868	3,005	10,889	811,112	64.7	81.4
Limited-Scope							
Tulsa MSA	278,053	117,647	940	9,035	405,675	32.4	18.1
Non-MSA OK	30,055	6,325	214	0	36,594	2.9	0.5
Total	836,458	392,840	4,159	19,924	1,253,381	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 9.7 percent. The bank ranked third among 67 depository financial institutions, placing it in the top 5 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of one percent based on the number of home mortgage loans originated or purchased. The bank ranked 27th among 398 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were First United Bank & Trust Company (7 percent), Rocket Mortgage (4.9 percent), and Cornerstone Capital Bank (4.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 21.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 75 small business lenders in the AA. The other top lenders were American Express (20.3 percent), Capital One (8.7 percent), and Synchrony Bank (6 percent).

In overall small loans to farms for 2022, the bank had a market share of 15.8 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 14 small farm lenders in the AA, which placed it in the top 15 percent of lenders. The other top lenders were Bancfirst (39.2 percent), Interbank (10.8 percent), and John Deere Financial (10.8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies were near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans in low-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Oklahoma 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 14 CD loans totaling \$10.9 million, which represented 2.4 percent of the allocated tier 1 capital. By dollar volume, 99.1 percent of these loans funded revitalization and stabilization efforts, and 0.9 percent funded economic development. All CD loans originated within the AA were PPP loans that provided relief for organizations due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 1,309 loans in the amount of \$108.2 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	108	15,965
Federal Housing Administration (FHA)	29	5,048
Chase Homebuyer Grant Loans	81	13,534
Homebuyer Education Grants	70	35
Home Lending SPCP	12	2,195
Community Lending Program (Correspondent SPCP)	10	1,903
Veteran's Administration (VA)	18	4,788
VA Purchase Closing Credit	9	2,239
Business Card SPCP	14	44
Business Banking SPCP	15	1,475
Small Business Administration (SBA)	9	2,400
Paycheck Protection Program (PPP)	934	58,559
Total	1,309	108,185

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tulsa MSA was stronger than the bank's performance in the full-scope area due to a higher level of CD lending activity. The bank's performance in the non-MSA Oklahoma AA was weaker than the bank's performance in the full-scope area due to no CD lending activity. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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 the state of Oklahoma is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the rating, while investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investor. The dollar volume of current- and prior-period investments represented 6.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made nine grants and donations, totaling \$294,980 to eight organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Oklahoma City MSA	4	3,637	20	26,185	24	36.9	29,821	8.2	0	0
Limited-Scope										
Tulsa, OK MSA	2	2,836	7	11,150	9	13.9	13,986	3.8	0	0
Non-MSA OK	0	0	1	22	1	1.5	22	0.0	0	0
Broader Statewide/Regional Area										
Direct Benefit	1	551	0	0	1	1.5	551	0.2	0	0
Indirect Benefit	16	4,160	14	315,844	30	46.2	320,004	87.8	0	0
Total	23	11,183	42	353,200	65	100.0	364,384	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99 percent of investments supported affordable housing, 0.9 percent supported economic development, and 0.1 percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made nine LIHTC investments totaling \$25.4 million that supported 705 affordable units.

Qualified investments made during the evaluation period include:

- An \$8.5 million LIHTC investment to construct 41 single-family homes in a low-income geography. The project has income restriction for 40 of the units to be leased exclusively to low- and moderate-income persons or families.
- A grant totaling \$112,500 to a nonprofit CDC that supports and revitalizes communities that have experienced significant disinvestment. The grant supported programs that provide resources to small businesses and technology for use by entrepreneurs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Tulsa MSA was consistent with the bank's performance in the full-scope area. Performance in the non-MSA Oklahoma was weaker than the bank's performance in the full-scope areas due to a lower volume of qualified investments. Performance in the limited-scope areas had a neutral impact on the overall Investment Test conclusion in the state of Oklahoma.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Oklahoma. The bank had one investment totaling \$551,279 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This investment promoted affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$320 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included a renewable energy tax credit and LIHTCs that supported 1,742 affordable units.

SERVICE TEST

The bank's performance under the Service Test in the state of Oklahoma is rated High Satisfactory. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Oklahoma.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Oklahoma City MSA	81.5	16	61.5	0.0	18.8	56.3	25.0	0.0	6.3	23.5	35.7	32.8	1.7
Limited-Scope													
Tulsa MSA	18.1	9	34.6	11.1	33.3	22.2	33.3	0.0	6.1	30.7	26.0	36.8	0.5
Non-MSA OK	0.5	1	3.9	100.0	0.0	0.0	0.0	0.0	3.8	27.4	32.4	30.6	5.9
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was significantly below and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered seven branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which five were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Oklahoma City MSA included a Community Branch in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 41 deposit-taking ATMs in the AA, of which none were in low-income geographies and 31.7 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Oklahoma City MSA	0	2	0	-1	-1	0	0

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Limited-Scope							
Tulsa MSA	1	1	0	0	0	0	0
Non-MSA OK	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, 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 did not open any branches in the AA during the evaluation period. The bank closed two branches, of which one was in a moderate-income geography. The branch closures were the result of efforts to optimize market efficiency and improve the customer experience.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. Thirteen branches had drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Oklahoma City MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 568 qualified CD service activities to 24 organizations, for a total of 730 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial capability/literacy training, and pre-purchase homebuyer education.

Service activities during the evaluation period include:

- JPMCB partnered with several 14 CCAs and assisted 401 individuals with credit counseling and debt education. JPMCB service supported budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.
- The bank provided homebuyer education seminars to 70 individuals, accounting for 193 hours of service. The trainings explain the mortgage process, products, services, and programs available for low- and moderate-income individuals, and lender decision making process.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Tulsa MSA and non-MSA Oklahoma AA was stronger than the bank's performance in the full-scope area due to higher branch distribution percentages in low-income geographies. Performance in the limited-scope AAs had a neutral impact on the overall Service Test conclusion.

State of Oregon

CRA Rating for the State of Oregon²⁷: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB was a leader in making CD loans.
- An overall adequate level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs. Performance in the limited-scope AAs and investments in the broader statewide or regional areas positively impacted the overall Investment Test conclusion.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Oregon

Examiners assessed performance in four AAs in the state of Oregon rating area. These were comprised of the entire Medford-Grants Pass, OR (Medford) CSA and Bend-Prineville, OR (Bend) CSA the entire Eugene-Springfield, OR (Eugene) MSA, and six counties in the non-MSA Oregon AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Oregon is JPMCB's 25th largest rating area. As of June 30, 2023, the bank had approximately \$2.9 billion in deposits in the state of Oregon rating area, of which approximately \$2.8 billion represent retail branch deposits. As of December 31, 2023, the bank operated 21 branches and 34 deposit taking ATMs in the rating area, representing 0.4 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$1.4 billion in loans, or 0.2 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 37 banks operating 747 branches in the state rating area. JPMCB ranked fifth in deposit market share with 12.7 percent. Primary competitors include U.S. Bank with 20.4 percent deposit market share, Umpqua Bank with 15.8 percent, and Bank of America with 13.2 percent.

²⁷ 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.

Medford CSA

The Medford CSA AA consists of Jackson and Josephine counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 11 banks operating 63 branches in the AA. JPMCB operated eight branches in the AA and was ranked first in deposit market share with 17.6 percent. Primary competitors include Umpqua Bank with 15 percent deposit market share, U.S. Bank with 13.3 percent, and Wells Fargo Bank with 11.8 percent. As of December 31, 2023, the bank operated 13 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Medford CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Medford CSA 2020-2021						
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	37,448	3.9	15.9	56.5	23.7	0.0
Farms by Geography	2,072	1.2	9.1	66.5	23.3	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 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Medford CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	1.4	18.9	55.4	23.0	1.4
Population by Geography	311,349	0.7	20.2	57.3	21.0	0.8
Housing Units by Geography	135,680	0.7	20.9	56.2	21.3	0.9
Owner-Occupied Units by Geography	82,838	0.1	17.7	56.7	24.5	0.9

Table A – Demographic Information of the Assessment Area Assessment Area: Medford CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	43,458	1.6	27.4	56.4	14.1	0.5
Vacant Units by Geography	9,384	1.2	18.4	50.6	26.5	3.3
Businesses by Geography	48,706	4.1	17.1	54.8	23.4	0.7
Farms by Geography	2,776	1.3	11.8	60.2	24.7	2.0
Family Distribution by Income Level	81,715	20.1	19.0	20.8	40.2	0.0
Household Distribution by Income Level	126,296	24.2	15.8	18.1	41.9	0.0
Median Family Income MSA - 24420 Grants Pass, OR MSA		\$57,003	Median Housing Value			\$300,658
Median Family Income MSA - 32780 Medford, OR MSA		\$70,436	Median Gross Rent			\$1,043
			Families Below Poverty Level			9.4%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Medford CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Medford CSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Medford CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$581 to \$668 according to 2015 ACS data and from \$713 to \$880 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$929 to \$1,069 according to 2015 ACS data and ranging from \$1,140 to \$1,409 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Medford CSA would be \$1,191 using 2015 ACS data and \$1,614 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 31.7 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Medford MSA and by 42.1 percent in the Grants Pass MSA. This acceleration in home prices worsened existing affordability concerns in the Medford CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Medford CSA, 13.7 percent of families had incomes below the FPL according to the 2015 ACS and 9.4 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Medford CSA was 4.7 percent compared to the Oregon state unemployment rate of four percent and the national unemployment rate of 3.5 percent.

Economic Data

Medford area's employment growth lagged the rates of Oregon and the nation. The economy was led by healthcare and consumer-dependent services, while manufacturing and the public sector hindered overall job growth. The unemployment rate trended higher in late 2022 and early 2023, returning to 2021 levels. Single-family house prices declined faster than nationally on a month-to-month basis. The area's strengths included a high quality of life, favorable migration trends, relatively low business costs, and a high proportion of jobs in new companies. Weaknesses included exposure to a cyclical tourism industry, above-average employment volatility, distance from major airports and seaports, and an unfavorable demographics.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations that serve the area. These organizations focus on community services and community development. Contacts noted that the cost of living was high, and area wages did not line up with the cost of living. Housing costs were very high and there was a lack of inventory. Access to affordable housing was a key need in the area. The scarcity of affordable housing hindered efforts to attract new workers to the area. In 2020, wildfires directly affected 2,600 housing units, adding further strain to the housing market. There was a need for financing options for mobile homes. There was also a need for funding to support rebuilding and revitalization efforts pertaining to the wildfires. Other needs identified include:

- Financial Education and Coaching
- Credit building products and programs
- Funding support for housing developers
- Small business lending
- Financing for projects to address the housing shortage
- Funding to support mental health services

Scope of Evaluation in State of Oregon

Examiners selected the Medford CSA for full-scope review, as it represented the largest concentration of deposits and branches in the state of Oregon. The CSA accounts for 40.9 percent of the bank's adjusted deposits and 27.6 percent of lending in the state. The Bend CSA, Eugene MSA, and non-MSA Oregon AA received limited-scope reviews. Refer to the table in appendix A for more information.

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 the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Medford CSA	895	4,074	249	5	5,223	27.5	40.8
Limited-Scope							
Bend CSA	1,167	4,927	105	2	6,201	32.7	24.2
Eugene MSA	715	3,942	144	13	4,814	25.4	21.2
Non-MSA OR	561	1,987	167	2	2,717	14.3	13.8
Broader Statewide/Regional Area							
Direct Benefit				7	7	0.0	
Indirect Benefit				3	3	0.0	
Total	3,338	14,930	665	32	18,965	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Medford CSA	250,773	75,512	3,488	18,672	348,445	22.6	40.8
Limited-Scope							
Bend CSA	547,458	80,721	1,286	19	629,484	39.9	24.2
Eugene MSA	290,683	63,954	1,889	23,548	380,074	24.1	21.2
Non-MSA OR	151,687	25,589	1,948	1,734	180,958	11.5	13.8
Broader Statewide/Regional Area							
Direct Benefit				38,556	38,556	2.4	
Indirect Benefit				1,830	1,830	0.1	
Total	1,240,601	245,776	8,611	84,359	1,579,347	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 17.6 percent. The bank ranked first among 11 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 1.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 21st among 322 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were Rogue Credit Union (18.2 percent), Guild Mortgage Company (5.6 percent), and Umpqua Bank (4.4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 19.8 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 59 small business lenders in the AA. The other top lenders were American Express (16.2 percent), U.S. Bank (14 percent), and Capital One (9.1 percent).

In overall small loans to farms for 2022, the bank had a market share of 34.8 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 13 small farm lenders in the AA, which placed it in the top 16 percent of lenders. The other top lenders were U.S. Bank (38.2 percent), Wells Fargo Bank (9.7 percent), and Washington Federal (5.8 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, while the bank did not originate or purchase any home mortgage loans in low-income geographies, only 0.1 percent of owner-occupied housing units were in low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of home mortgage loans in low-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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 tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of small loans to businesses in both low- and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and was below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The

bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with gross annual revenues of \$1 million or less.

Small Loans to Farms

Refer to Table T in the Oregon 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made five CD loans totaling \$18.7 million, which represented 15.8 percent of the allocated tier 1 capital. By dollar volume, 99.7 percent of these loans funded affordable housing and 0.3 percent funded economic development. Two of the total CD loans were PPP loans totaling \$50,967 that provide

relief for organizations due to the COVID-19 pandemic. The other three loans, totaling \$18.6 million, supported affordable housing for those displaced by wildfires in 2020.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 423 loans in the amount of \$37.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	20	3,485
Federal Housing Administration (FHA)	5	1,732
Chase Homebuyer Grant Loans	19	5,509
Homebuyer Education Grants	7	4
Veteran's Administration (VA)	3	1,061
VA Purchase Closing Credit	2	696
Small Business Administration (SBA)	3	360
Paycheck Protection Program (PPP)	364	24,254
Total	423	37,101

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Oregon.

The bank made seven CD loans totaling \$38.6 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$1.8 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Eugene MSA and non-MSA Oregon was consistent with the bank's performance in the full-scope area. Performance in the Bend CSA was weaker than the bank's performance in the full-scope area due to a lower geographic distribution of loans and lower levels of CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a

positive impact and raised the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an adequate level of qualified CD investments and grants, not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 3.3 percent of allocated tier 1 capital. Of the total qualified investments, the bank made five grants and donations, totaling \$29,500 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Medford CSA	4	3,874	5	30	9	32.1	3,904	5.0	0	0
Limited-Scope										
Bend CSA	0	0	2	14,444	2	7.1	14,444	18.6	0	0
Eugene MSA	4	18,729	1	11,900	5	17.9	30,629	39.5	0	0
Non-MSA OR	4	2,430	3	17,509	7	25.0	19,939	25.7	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	2	29	2	7.1	29	0.0	0	0
Indirect Benefit	2	298	1	8,384	3	10.7	8,682	11.2	0	0
Total	14	25,331	14	52,296	28	100.0	77,627	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and CD needs. Investments were particularly responsive to identified CD needs for community services to low- and moderate-income individuals. By dollar volume, 99.2 percent funded community services to low- and moderate-income individuals and 0.8 percent of investments supported affordable housing.

The bank did not make any innovative and/or complex investments to support CD initiatives during this evaluation period. Qualified investments made during the evaluation period include:

- Four grants totaling \$17,500 to a local community services organization that provides food, shelter, and other essential services to low-income children, families, seniors, veterans, and people with disabilities. They also provide financial education for low- and moderate-income individuals focused on buying or owning a home, managing finances, and making a home energy-efficient.
- A \$12,000 grant to a community development organization aiding LMI communities within the bank's AA. The organization focuses on community development, housing justice, financial education, and the arts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bend CSA, Eugene MSA, and non-MSA Oregon AA was stronger than the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope areas had a positive impact on the Investment Test conclusion.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas had a positive impact on the Investment Test rating for the state of Oregon. The bank made two investments totaling \$29,412 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals and revitalization and stabilization efforts.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$8.7 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 159 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of Oregon is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Oregon.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Medford CSA	40.8	8	38.1	12.5	25.0	37.5	25.0	0.0	0.7	20.2	57.3	21.0	0.8
Limited-Scope													
Bend CSA	24.2	5	23.8	20.0	20.0	60.0	0.0	0.0	1.5	16.1	55.2	27.3	0.0

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Eugene MSA	21.2	4	19.1	0.0	25.0	75.0	0.0	0.0	0.0	24.7	49.5	24.2	1.7
Non-MSA OR	13.8	4	19.1	0.0	50.0	25.0	25.0	0.0	0.6	20.8	64.6	14.1	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners also considered one branches located in a middle-income geography that served residents of a low-income geography.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 13 deposit-taking ATMs in the AA, of which 15.4 percent were in low-income geographies and 30.8 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Medford CSA	0	3	0	-1	-2	0	0
Limited-Scope							
Bend CSA	1	0	0	0	1	0	0
Eugene MSA	0	3	0	0	-2	-1	0
Non-MSA OR	0	1	0	0	-1	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, 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 did not open any branches during the evaluation period. The bank closed three branches, of which one was in a moderate-income geography. The branch closure was part of a broader management strategy to exit in-store locations.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00

a.m. to 1:00 p.m. on Saturday. All branches in the AA had drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Medford CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 279 qualified CD service activities to 18 organizations, for a total of 325 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by two bank employees spending 22 hours participating on boards and committees for two different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, workforce readiness, and homebuyer education.

Service activities during the evaluation period include:

- JPMCB partnered with 12 CCAs and assisted to 233 low- and moderate-income individuals with credit counseling and debt education. JPMCB service supported financial education and budget, debt management, housing counseling, student loan, and bankruptcy counseling.
- JPMCB employees provided workforce readiness trainings, impacting 45 low- and moderate-income individuals. This work was in direct response to a critical need for workforce development, especially for young adults, as stated by local community partners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bend CSA and the non-MSA Oregon was consistent with the bank's performance in the full-scope area. The bank's performance in the full-scope area was weaker than the bank's performance in the full-scope area due to lower percentages of branch distribution in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in limited-scope AAs did not impact the Service Test conclusion for the state of Oregon.

State of Pennsylvania

CRA Rating for the State of Pennsylvania²⁸: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB made an adequate level of CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs of the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Pennsylvania

Examiners assessed performance in two AAs in the state of Pennsylvania rating area. These were comprised of a majority of the Pittsburgh, PA (Pittsburgh) MSA and Scranton-Wilkes-Barre, PA (Scranton) MSA. The bank entered the Harrisburg-York-Lebanon, PA CSA after July 1, 2023. Examiners did not review performance in this AA as there was not enough activity to conduct a meaningful analysis. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Pennsylvania is JPMCB's 37th largest rating area. As of June 30, 2023, the bank had approximately \$553.2 million in deposits in the state of Pennsylvania rating area, of which approximately \$506.3 million represent retail branch deposits. As of December 31, 2023, the bank operated 28 branches and 99 deposit taking ATMs in the rating area, representing 0.6 percent of total branches and 0.6 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, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 57 banks operating 747 branches in the state rating area. JPMCB ranked 25th in deposit market share with 0.2 percent. Primary competitors include PNC Bank with 28.5 percent deposit market share, Wells Fargo Bank with 7 percent, and Citizens Bank, N.A. with 6.8 percent.

²⁸ 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.

Pittsburgh MSA

The Pittsburgh MSA AA consists of Allegheny, Butler, Washington, and Westmoreland counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 40 banks operating 529 branches in the AA. JPMCB operated 26 branches in the AA and was ranked 16th in deposit market share with 0.3 percent. Primary competitors include PNC Bank with 55.3 percent deposit market share, BNY Mellon, N.A. with 13.1 percent, and Tristate Capital Bank with 7.5 percent. As of December 31, 2023, the bank operated 95 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Pittsburgh MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: FS Pittsburgh MSA for Census 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	605	9.4	20.8	43.5	23.8	2.5
Population by Geography	1,986,311	5.5	16.6	47.2	30.1	0.6
Housing Units by Geography	931,103	6.4	18.6	47.5	27.3	0.2
Owner-Occupied Units by Geography	579,833	2.9	14.0	50.3	32.7	0.0
Occupied Rental Units by Geography	259,089	11.7	25.7	43.1	19.1	0.4
Vacant Units by Geography	92,181	13.6	27.8	42.2	16.1	0.3
Businesses by Geography	207,707	5.3	13.5	40.3	40.1	1.0
Farms by Geography	4,666	2.4	10.6	55.4	31.5	0.1
Family Distribution by Income Level	512,299	20.2	16.9	20.3	42.6	0.0
Household Distribution by Income Level	838,922	24.5	15.2	16.9	43.4	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$142,966
			Median Gross Rent			\$773
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Pittsburgh MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	616	7.8	20.8	41.4	26.3	3.7
Population by Geography	2,008,353	5.5	16.9	42.1	34.6	1.0
Housing Units by Geography	953,550	6.3	19.4	43.3	30.4	0.6
Owner-Occupied Units by Geography	593,028	2.8	15.8	45.8	35.4	0.2

Table A – Demographic Information of the Assessment Area Assessment Area: Pittsburgh MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	269,365	11.8	24.6	39.0	23.2	1.4
Vacant Units by Geography	91,157	12.9	27.4	39.6	19.1	1.0
Businesses by Geography	247,992	5.7	13.9	37.4	41.0	1.9
Farms by Geography	5,593	2.7	13.2	50.3	33.1	0.6
Family Distribution by Income Level	507,241	19.1	17.5	20.9	42.5	0.0
Household Distribution by Income Level	862,393	24.2	15.4	17.4	43.1	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$82,642	Median Housing Value			\$175,619
			Median Gross Rent			\$906
			Families Below Poverty Level			6.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Pittsburgh MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Pittsburgh MSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Pittsburgh MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$870 according to 2015 ACS data and \$1,033 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,392 according to 2015 ACS data and \$1,653 according to 2020 Census data. The monthly mortgage payment for the median home in the Pittsburgh MSA would be \$767 using 2015 ACS data and \$943 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 36.4 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Pittsburgh MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Pittsburgh MSA, 8.1 percent of families had incomes below the FPL according to the 2015 ACS and 6.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Pittsburgh MSA was 2.9 percent compared to the Pennsylvania state unemployment rate of 2.9 percent and the national unemployment rate of 3.5 percent.

Economic Data

Recent job gains in the Pittsburgh area were driven by a rebound in manufacturing, offsetting weaknesses in other industries such as education and healthcare. Pittsburgh evolved into an emerging technology hub, supporting growth in white-collar industries. Nonetheless, weak population trends limited the pool of available workers and prevented more robust growth. Soaring energy prices stimulated job growth in mining and extraction. Major employment industries included education and health services, professional and business services, and retail trade. Pittsburgh's strengths included top education and research institutions, a skilled and highly educated workforce, and a low cost of living compared to other Northeast areas. Weaknesses involved aging infrastructure and weak population trends.

Community Contacts

Examiners reviewed five community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on areas such as affordable housing, economic development, and advocacy for low and moderate-income individuals and communities. Contacts noted that the COVID-19 pandemic seemed to create an uptick in the number of entrepreneurial start-ups. People started businesses to either supplement income or create a new income source due to lost employment. This new activity created a need for funding for entrepreneurs and other small business start-ups. In many parts of the MSA, housing costs were outpacing household income, and many low-income households are housing cost burdened. Affordable housing was a need for many different constituencies including low-income households, elders, and persons with disabilities. There is an increased demand for single family homes. Contacts noted that the farming communities in the rural portions of the MSA are struggling and there is a need for small farm loans as very few banks offer this type of financing. Contacts noted that the area had an aging population and that the housing stock does not adequately meet their needs. In addition, contacts indicated that additional efforts were needed to attract and retain your residents and families, emphasizing the creation of affordable housing appealing to young families. The contacts indicated the importance of dispersing housing for low-income families and individuals away for low-income communities. This would provide these households with better access to amenities, potentially increasing economic mobility opportunities. Other needs identified include:

- Funding for home repair, rehabilitation, and modification
- Affordable workforce housing
- Loan products for people with blemished credit histories
- Down payment assistance programs for low and moderate-income homebuyers
- Small dollar loan products
- Support for programs that provide home care services for elders
- More financial institutions offering SBA loan programs

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

Scope of Evaluation in State of Pennsylvania

Examiners selected the Pittsburgh MSA for full-scope review, as it represented the largest concentration of deposits, branches, and lending in the state of Pennsylvania. The MSA accounts for 99.9 percent of the bank's adjusted deposits, and 85.8 percent of lending in the state. The Scranton MSA received a limited-scope review. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Scranton MSA during the evaluation period to conduct a meaningful analysis. Conclusions for the Lending Test for that AA are based solely on home mortgage and small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

The bank's performance under the Lending Test in the state of Pennsylvania is rated High Satisfactory. Performance in the limited-scope AAs supported the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Pittsburgh MSA	3,212	17,562	143	1	20,918	85.8	99.9
Limited-Scope							
Scranton MSA	454	2,989	22	4	3,469	14.2	0.1
Broader Statewide/Regional Area							
Direct Benefit				3	3	0.0	
Indirect Benefit				6	6	0.0	
Total	3,666	20,551	165	14	24,396	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Pittsburgh MSA	783,569	205,806	1,276	1,011	991,662	79.3	99.9
Limited-Scope							
Scranton MSA	80,645	38,175	207	97,133	216,160	17.3	0.1

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Broader Statewide/Regional Area							
Direct Benefit				19,180	19,180	1.5	
Indirect Benefit				23,496	23,496	1.9	
Total	864,214	243,981	1,483	140,820	1,250,498	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.3 percent. The bank ranked 16th among 40 depository financial institutions, placing it in the top 40 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 33rd among 584 home mortgage lenders in the AA, which placed it in the top 6 percent of lenders. The top three lenders were PNC Bank (10.4 percent), Citizen's Bank (9.4 percent), and Dollar Bank, FSB (7.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 14.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 122 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (23.1 percent), PNC Bank (11.3 percent), and Capital One (7.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 26.8 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 19 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (10.6 percent), U.S. Bank (9.8 percent), and The Huntington National Bank (8.9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Pennsylvania 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Pennsylvania 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table S in the state of Pennsylvania 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Pennsylvania 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan totaling \$1 million, which represented 1.9 percent of the allocated tier 1 capital. This CD loan was a PPP loan that supported revitalization and stabilization efforts to provide relief for an organization due to the COVID-19 pandemic.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 279 loans in the amount of \$56.6 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	51	7,748
Federal Housing Administration (FHA)	21	3,782
Chase Homebuyer Grant Loans	48	9,212
Homebuyer Education Grants	29	15
Home Lending SPCP	13	3,181
Community Lending Program (Correspondent SPCP)	5	1,013
Veteran's Administration (VA)	5	1,775
VA Purchase Closing Credit	2	382
Business Card SPCP	3	9
Business Banking SPCP	1	100
Small Business Administration (SBA)	3	650
Paycheck Protection Program (PPP)	98	28,727
Total	279	56,594

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Pennsylvania.

The bank made three CD loans totaling \$19.2 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted revitalization and stabilization efforts and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$23.5 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Scranton MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

Refer to Tables O through T in the state of state of Pennsylvania 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 Pennsylvania is rated Outstanding. Performance in the limited-scope AA and the broader statewide or regional areas supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had 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 dollar volume of current- and prior-period investments represented 71.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made five grants and donations, totaling \$502,000 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Pittsburgh MSA	6	16,049	9	21,433	15	44.1	37,482	51.5	0	0
Limited-Scope										
Scranton MSA	3	666	0	0	3	8.8	666	0.9	0	0
Broader Statewide/Regional Area										
Direct Benefit	1	121	6	20,246	7	20.6	20,367	28.0	0	0
Indirect Benefit	6	3,753	3	10,507	9	26.5	14,260	19.6	0	0
Total	16	20,590	18	52,186	34	100.0	72,776	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 98.7 percent of investments supported affordable housing and 1.3 percent funded community services to low- and moderate-income individuals.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two LIHTC investments totaling \$3.9 million that supported 68 affordable units and a \$667,285 HTC investment.

Qualified investments made during the evaluation period include:

A \$2.9 million LIHTC investment to convert a former school into affordable housing. The development consists of 35 units of affordable housing targeted to low- and moderate-income individuals.

Five grants totaling \$500,000 to a nonprofit, workforce development organization. The grants were used for the organization's summer youth employment program where the participants receive work experience through a six-week paid summer work program. The majority of individuals participating in this program were low- and moderate-income individuals.

Conclusions for Area Receiving a Limited-Scope Review

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

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Pennsylvania. The bank made seven investments totaling \$20.4 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments included LIHTCs that supported 604 affordable units, revitalization and stabilization efforts, and community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$14.3 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included seven LIHTC investments that supported 381 units of affordable housing for low- and moderate-income individuals, and three NMTC investments.

SERVICE TEST

The bank's performance under the Service Test in the state of Pennsylvania is rated Outstanding. Performance in the limited-scope AA supported the Service Test conclusion for the state of Pennsylvania.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income

levels in the bank's AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Pittsburgh MSA	99.9	26	92.9	15.4	7.7	19.2	50.0	7.7	5.5	16.9	42.1	34.6	1.0
Limited-Scope													
Scranton MSA	0.1	2	7.1	50.0	50.0	0.0	0.0	0.0	3.1	27.3	43.0	26.0	0.5
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was well below the percentage of the population living within those geographies. Examiners considered the impact of the 2020 Census changes. One low-income tract, where a branch is located, changed to an income tract with no income classification. In addition, one moderate-income tract, where a branch is located, changed to a low-income tract, and two moderate-income tracts, each with a branch, changed to middle-income tracts. Examiners further considered 13 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which one was within 1,000 feet of a low-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS, including ATMs, online banking, and mobile banking options. The bank had 95 deposit-taking ATMs in the AA, of which 13.7 were in low-income geographies and 6.3 percent were in moderate-income geographies. Low- and moderate-income ATM distribution in the AA was impacted by the 2020 Census with nine moderate-income ATMs changing to middle- and upper-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Pittsburgh MSA	23	0	2	5	5	9	2
Limited-Scope							
Scranton MSA	2	0	1	1	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, the bank's opening and closing of branches improved accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened 23 branches, of which two were in low-income geographies and five were in moderate-income geographies. The bank did not close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Pittsburgh MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total 694 qualified CD service activities to 28 organizations, for a total of 1,091 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by four bank employees spending 265 hours participating on boards and committees for six different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with community services.

Service activities during the evaluation period include:

- A bank employee served on the board of a nonprofit organization that provides financial literacy, and career readiness and entrepreneurship programs to students in Western Pennsylvania. As a board member for this nonprofit organization, the bank employee ensured that the organization was financially stable and helped define the organization's strategic goals.
- The bank partnered with 16 nonprofit CCAs and provided tailored credit counseling and debt education to 638 low- and moderate-income individuals. The topics covered included budget counseling, debt management plans, foreclosure prevention, student loan counseling, and bankruptcy counseling.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Scranton MSA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall Service Test conclusion.

State of South Carolina

CRA Rating for the State of South Carolina: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

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

Examiners assessed performance in two AAs in the state of South Carolina rating area. These were comprised of the entire Charleston-North Charleston, SC (Charleston) MSA and a majority of the Greenville-Anderson, SC (Greenville) MSA. The bank entered the Columbia-Orangeburg-Newberry, SC CSA after July 1, 2023. Examiners did not review performance in this AA as there was not enough activity to conduct a meaningful analysis. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of South Carolina is JPMCB's 33rd largest rating area. As of June 30, 2023, the bank had approximately \$668.5 million in deposits in the state of South Carolina rating area, of which approximately \$637.2 million represent retail branch deposits. As of December 31, 2023, the bank operated 17 branches and 68 deposit taking ATMs in the rating area, representing 0.3 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$2.2 billion in loans, or 0.4 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 76 banks operating 1,142 branches in the state rating area. JPMCB ranked 26th in deposit market share with 0.5 percent. Primary competitors include Wells Fargo Bank with 15.5 percent deposit market share, Bank of America with 14.8 percent, and Truist Bank with 11.7 percent.

Charleston MSA

The Charleston MSA AA consists of Berkeley, Charleston, and Dorchester counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 34 banks operating 181 branches in the AA. JPMCB operated nine branches in the AA and was ranked 15th in deposit market share with 1.3 percent. Primary competitors include Wells Fargo Bank with 17.8 percent deposit market share, Bank of America with 15.2 percent, and Southstate Bank, N.A. with 13.2 percent. As of December 31, 2023, the bank operated 37 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Charleston MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	9.0	22.4	37.8	28.2	2.6
Population by Geography	712,232	6.7	21.4	41.9	29.2	0.8
Housing Units by Geography	309,113	6.7	21.2	40.2	31.1	0.8
Owner-Occupied Units by Geography	173,999	3.3	19.1	42.4	34.9	0.3
Occupied Rental Units by Geography	94,905	12.5	24.4	40.5	21.3	1.4
Vacant Units by Geography	40,209	8.1	22.9	29.9	37.5	1.7
Businesses by Geography	60,837	7.6	18.6	34.6	37.6	1.5
Farms by Geography	1,486	3.4	18.8	44.9	32.4	0.5
Family Distribution by Income Level	173,525	22.6	16.7	19.9	40.8	0.0
Household Distribution by Income Level	268,904	24.5	15.7	17.6	42.2	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$65,558	Median Housing Value			\$241,873
			Median Gross Rent			\$1,021
			Families Below Poverty Level			11.4%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	7.3	27.0	31.5	31.5	2.8
Population by Geography	799,636	6.0	25.0	33.8	34.3	0.9
Housing Units by Geography	339,240	6.4	26.0	31.8	34.3	1.5
Owner-Occupied Units by Geography	200,413	4.6	22.8	33.6	38.4	0.6

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	99,534	9.4	33.9	31.4	23.9	1.4
Vacant Units by Geography	39,293	8.4	22.9	23.5	39.2	6.0
Businesses by Geography	152,151	6.7	22.7	28.1	41.4	1.2
Farms by Geography	3,281	6.1	27.2	33.2	32.9	0.6
Family Distribution by Income Level	189,753	22.1	17.2	20.1	40.6	0.0
Household Distribution by Income Level	299,947	24.0	16.1	17.9	42.0	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$82,122	Median Housing Value			\$313,553
			Median Gross Rent			\$1,233
			Families Below Poverty Level			8.2%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Charleston MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Charleston MSA, low- and moderate-income borrowers would be challenged to afford a home mortgage loan when considering 2020 Census data.

In the Charleston MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$819 according to 2015 ACS data and \$1,027 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,311 according to 2015 ACS data and \$1,642 according to 2020 Census data. The monthly mortgage payment for the median home in the Charleston MSA would be \$1,298 using 2015 ACS data and \$1,683 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 63.6 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns in the Charleston MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Charleston MSA, 11.4 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Charleston MSA was 2.5 percent compared to the South Carolina state unemployment rate of 3.1 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Charleston's economy performed exceptionally well, with job growth exceeding both state and national averages. The large professional/business services and leisure/hospitality sectors drove job gains, although factory and public sector hiring were also strong. New manufacturing investments, especially in the production of electric vehicles and related components, were significant sources of new high-paying jobs. The area's large defense industry provided long-term job stability as the metro area's largest employer. Strengths within the Charleston MSA included a highly diverse economy with a modern port, strong demographics with robust net migration, and an aerospace products and parts manufacturing hub. Weaknesses were noted in a high concentration of jobs in low-value-added leisure/hospitality sector and high single-family housing prices.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on community services and economic development. In addition, a review was also conducted of two community needs assessments completed for Dorchester and Berkeley counties during the evaluation period. The area contains urban, suburban and rural areas. There are areas of upper Dorchester County that were extremely rural and lacked basic infrastructure and job opportunities. Contacts noted that Berkeley County had the lowest median household income in the region and that 45 percent of area residents are paying more than 30 percent of their household income towards housing. Housing prices have been increasing in the area placing homeownership opportunities out of reach for low- and moderate-income households. There was a need for infrastructure improvements both in rural areas as well as low-income urban areas. Many rural parts of the area did not have access to public water and sewer systems and many sewer lines in low-income urban areas have deteriorated and posed a health risk to residents. In addition, the area had no or limited public transportation. Many rural areas do not have access to grocery stores or healthcare services, which are also identified as needs in the area. Other needs identified include:

- Access to quality affordable childcare
- Affordable housing
- Workforce development and job training for low- and moderate-income individuals
- Downtown and neighborhood revitalization support for the area's smaller towns and localities

Scope of Evaluation in State of South Carolina

Examiners selected the Charleston MSA for full-scope review, as it represented the largest concentration of branches and lending in the state of South Carolina. The MSA accounts for 40.5 percent of the bank's adjusted deposits and 55.7 percent of lending in the state. The Greenville MSA received a limited-scope review. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in the state of South Carolina is rated Outstanding. Performance in the limited-scope AA had a positive impact on the overall state rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Charleston MSA	2,013	8,290	70	22	10,395	55.7	40.1
Limited-Scope							
Greenville MSA	1,441	6,689	105	4	8,239	44.2	59.9
Broader Statewide/Regional Area							
Direct Benefit				5	5	0.0	
Indirect Benefit				14	14	0.1	
Total	3,454	14,979	175	45	18,653	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Charleston MSA	1,080,444	98,063	734	288,074	1,467,315	65.7	40.1
Limited-Scope							
Greenville MSA	432,283	83,422	1,000	83,136	599,841	26.9	59.9
Broader Statewide/Regional Area							
Direct Benefit				104,267	104,267	4.7	
Indirect Benefit				60,465	60,465	2.7	
Total	1,512,727	181,485	1,734	535,942	2,231,888	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.3 percent. The bank ranked 15th among 34 depository financial institutions, placing it in the top 45 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked 41st among 656 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were Rocket Mortgage (5.5 percent), Southstate Bank, N.A. (3.8 percent), and First Citizens Bank and Trust (3.7 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 103 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (27.5 percent), Bank of America (9.7 percent), and Synchrony Bank (7 percent).

In overall small loans to farms for 2022, the bank had a market share of 26.1 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 10 small farm lenders in the AA. The other top lenders were U.S. Bank (21.6 percent), John Deere Financial (15.9 percent), and Wells Fargo Bank (11.4 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of South Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low- and moderate-income geographies was well below the percentage of businesses in those geographies and below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of South Carolina 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was below the percentage of farms in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 because the bank did not purchase or originate any small loans to farms in low-income geographies and had a lower distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of South Carolina 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 22 CD loans totaling \$288.1 million, which represented 1,080.2 percent of the allocated tier 1 capital. By dollar volume, 52.8 percent of these loans funded community services targeted to low- and moderate-income individuals, 46.4 percent funded affordable housing, and 0.6 percent funded revitalization and stabilization efforts. Of the total CD loans, one was a PPP loan totaling \$1.7 million to provide relief for an organization due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$26.8 million construction loan for an affordable housing development consisting of 54 units restricted to households earning 80 percent or less of the AMI and 162 units restricted to households earning 60 percent of the AMI or less.
- A \$23 million construction loan to finance the adaptive re-use of a former school and the new construction of two buildings featuring 89 affordable units. Occupancy will be seniors with incomes restricted to 60 percent or less of AMI.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 202 loans in the amount of \$34.3 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	28	5,863
Federal Housing Administration (FHA)	5	1,254
Chase Homebuyer Grant Loans	18	6,825
Homebuyer Education Grants	14	7
Home Lending SPCP	9	2,683
Community Lending Program (Correspondent SPCP)	29	7,639
Veteran's Administration (VA)	5	1,978
VA Purchase Closing Credit	3	1,137
Business Card SPCP	11	45
Business Banking SPCP	3	75
Small Business Administration (SBA)	2	350
Paycheck Protection Program (PPP)	75	6,478
Total	202	34,334

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of South Carolina.

The bank made five CD loans totaling \$104.3 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted affordable housing and revitalization and stabilization efforts.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$60.5 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Greenville MSA AA was stronger than the bank's performance in the full-scope area due to better geographic distribution

of lending. Performance in the limited-scope AA had a positive impact on the overall Lending Test conclusion.

Refer to Tables O through T in the state of South Carolina 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 South Carolina is rated Outstanding. Performance in the limited-scope AA and broader statewide or regional areas supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 178.6 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Charleston MSA	1	173	18	47,462	19	32.2	47,634	21.3	0	0
Limited-Scope										
Greenville MSA	0	0	8	43,994	8	13.6	43,994	19.7	0	0
Broader Statewide/Regional Area										
Direct Benefit	4	3,603	10	69,958	14	23.7	73,561	33.0	0	0
Indirect Benefit	9	7,008	9	51,021	18	30.5	58,029	26.0	0	0
Total	14	10,784	45	212,435	59	100.0	223,218	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made two LIHTC investments totaling \$41.5 million that supported 226 affordable units and a \$667,285 HTC investment.

Qualified investments made during the evaluation period include:

- A \$38.8 million LIHTC investment in new affordable housing development. The project will contain 162 units restricted to individuals and families earning 60 percent or less of the AMI.
- A \$2.7 million investment in a LIHTC housing fund. The bank's investment supports a property that consists of 64 affordable housing units.

Conclusions for Area Receiving a Limited-Scope Review

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

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of South Carolina. The bank made 14 investments totaling \$73.6 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments included LIHTCs that supported 1,014 affordable units and grants that promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$58 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 948 affordable units and NMTCs.

SERVICE TEST

The bank's performance under the Service Test in the state of South Carolina is rated High Satisfactory. Performance in the limited-scope AA supported the Service Test conclusion for the state of South Carolina.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Charleston MSA	40.1	9	52.9	11.1	11.1	22.2	55.6	0.0	6.0	25.0	33.8	34.3	0.9
Limited-Scope													
Greenville MSA	60.0	8	47.1	0.0	12.5	37.5	50.0	0.0	4.5	18.8	41.8	34.3	0.6
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was well below the percentage of the population living within those geographies. Examiners further considered four branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 37 deposit-taking ATMs in the AA, of which 8.1 percent were in low-income geographies and 16.2 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Charleston MSA	9	0	1	1	3	4	0
Limited-Scope							
Greenville MSA	7	0	1	1	1	4	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened nine branches, of which one was in a low-income geography, and another was in a moderate-income geography. The bank closed no branches during the evaluation period.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were generally 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Charleston MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 277 qualified CD service activities to 17 organizations, for a total of 384 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial capability training, and pre-purchase homebuyer education.

Service activities during the evaluation period include:

- JPMCB partnered with 15 CCAs and assisted 250 individuals with credit counseling and debt education. JPMCB employees assisted in providing budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.
- JPMCB facilitated six financial literacy seminars at an educational institution serving the low- and moderate-income community, impacting 180 individuals. The seminars trained participants on the fundamental building blocks of personal finance, saving, budgeting, and consumer rights.

Conclusions for Area Receiving a Limited-Scope Review

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

State of South Dakota

CRA Rating for the State of South Dakota: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

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

Examiners assessed performance in a single AA in the state of South Dakota rating area. This AA was comprised of a portion of the Sioux Falls, SD (Sioux Falls) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of South Dakota is JPMCB's 54th largest rating area. As of June 30, 2023, the bank had approximately \$61.7 million in deposits in the state of South Dakota rating area, of which approximately \$58.1 million represent retail branch deposits. As of December 31, 2023, the bank operated four branches and 15 deposit taking ATMs in the rating area, representing 0.1 percent of total branches and 0.1 percent of total ATMs. The bank originated and purchased approximately \$277.8 million in loans, or 0.04 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

The Sioux Falls MSA AA consists of Lincoln and Minnehaha counties. According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 35 banks operating 119 branches in the state rating area. JPMCB operated four branches in the AA and was ranked 24th in deposit market share with less than 0.1 percent. Banks with the largest market shares include Citibank with 58.6 percent, Wells Fargo Bank with 38.5 percent, and The Bancorp Bank, N.A. with 0.9 percent. South Dakota, and Sioux Falls specifically, are unique as both Citibank and Wells Fargo Bank are legally headquartered in the state. For both banks, nonlocal deposits are held here, resulting in their outsized deposit market share. As of December 31, 2023, the bank operated 15 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Sioux Falls MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Sioux Falls MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	0.0	32.1	45.3	22.6	0.0
Population by Geography	228,816	0.0	29.5	47.7	22.9	0.0
Housing Units by Geography	93,533	0.0	32.7	45.4	21.9	0.0
Owner-Occupied Units by Geography	58,782	0.0	21.5	51.8	26.7	0.0
Occupied Rental Units by Geography	29,395	0.0	53.2	33.8	13.0	0.0
Vacant Units by Geography	5,356	0.0	43.7	38.5	17.8	0.0
Businesses by Geography	28,117	0.0	37.0	34.9	28.2	0.0
Farms by Geography	1,288	0.0	11.2	59.8	29.0	0.0
Family Distribution by Income Level	57,695	18.8	17.9	24.4	38.9	0.0
Household Distribution by Income Level	88,177	21.9	18.1	18.8	41.2	0.0
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$72,948	Median Housing Value			\$160,629
			Median Gross Rent			\$725
			Families Below Poverty Level			7.2%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Sioux Falls MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	3.3	25.0	50.0	20.0	1.7
Population by Geography	262,375	1.8	22.5	53.3	21.8	0.5
Housing Units by Geography	104,600	3.0	25.4	51.9	18.7	1.1
Owner-Occupied Units by Geography	64,662	1.1	18.2	56.1	24.6	0.0
Occupied Rental Units by Geography	34,132	6.3	35.7	45.2	9.5	3.2
Vacant Units by Geography	5,806	4.6	45.3	43.9	6.2	0.0
Businesses by Geography	41,185	10.0	23.7	41.9	21.9	2.5
Farms by Geography	1,646	2.9	10.1	63.5	23.1	0.4
Family Distribution by Income Level	62,753	18.5	17.9	24.6	39.0	0.0
Household Distribution by Income Level	98,794	22.3	17.0	19.4	41.2	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Sioux Falls MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$84,874	Median Housing Value			\$207,646
			Median Gross Rent			\$834
			Families Below Poverty Level			5.3%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Sioux Falls MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Sioux Falls MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering 2020 Census data.

In the Sioux Falls MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$912 according to 2015 ACS data and \$1,061 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,459 according to 2015 ACS data and \$1,697 according to 2020 Census data. The monthly mortgage payment for the median home in the Sioux Falls MSA would be \$862 using 2015 ACS data and \$1,115 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 47.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Sioux Falls MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Sioux Falls MSA, 7.2 percent of families had incomes below the FPL according to the 2015 ACS and 5.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Sioux Falls MSA was 1.8 percent compared to the state of South Dakota at 2 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Sioux Falls economy slowed amid an extremely tight labor market. The consumer services sector primarily drove the slowdown, with healthcare, retail, and leisure/hospitality experiencing declines. Financial services also struggled with losses concentrated in the early part of 2023. While the

unemployment rate increased, it remained one of the lowest nationwide. Single-family house price appreciation was slowing and trailed the national pace. Strengths within the Sioux Falls area included some of the lowest business costs in the U.S., its status as a regional hub for education and healthcare, and strong population trends bolstered by labor force growth. Weaknesses included vulnerability to shocks due to high concentrations of financial services jobs and a remote location that limits overall potential.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, economic development, and small business. Contacts noted that since the COVID-19 pandemic, the housing market in Sioux Falls has been tight, particularly as it pertains to affordable housing. Households that qualified for rental assistance were having difficulty locating housing due to lack of vacancies and landlords who are unwilling to work with renters receiving third party rental assistance. While there is multifamily housing that was being built, much of it is out of the price range for low and moderate-income households. There was a need for affordable rental housing, particularly units with more than two bedrooms. Contacts noted that the unemployment rate is low, and some manufacturers were having difficulties hiring workers. There was a need for access to affordable childcare for working families. Contacts also noted that a significant portion of the northwest area of Sioux Falls, which is primarily a low-income area, is a food desert with limited access to supermarkets and grocery stores. There was a need to support programs that address food-insecurity.

Scope of Evaluation in State of South Dakota

Examiners selected the Sioux Falls MSA for full-scope review. There were no other AAs within the state of South Dakota. Refer to the table in appendix A for more information.

There were no low-income geographies in the Sioux Falls MSA during the 2021 through 2022 analysis period. All geographic conclusions were based solely on performance in moderate-income geographies for that analysis period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Sioux Falls MSA	901	2,816	91	0	3,808	100.0	100.0
Total	901	2,816	91	0	3,808	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Sioux Falls MSA	245,624	31,274	943	0	277,841	100.0	100.0
Total	245,624	31,274	943	0	277,841	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of less than 0.1 percent. The bank ranked 24th among 35 depository financial institutions, placing it in the top 69 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 45th among 2022 home mortgage lenders in the AA, which placed it in the top 23 percent of lenders. The top three lenders were Plains Commerce Bank (17.4 percent), First Premier Bank (11.7 percent), and Levo Federal Credit Union (7.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 15.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 68 small business lenders in the AA. The other top lenders were American Express (14.8 percent), Capital One (9.8 percent), and The First National Bank in Sioux Falls (9.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 3.5 percent based on the number of small loans to farms originated or purchased. The bank ranked eighth among 23 small farm lenders in the AA, which placed it in the top 35 percent of lenders. The top three lenders were The First National Bank in Sioux Falls (27.2 percent), First Bank & Trust (22.3 percent), and John Deere Financial (11.9 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans in moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance in moderate-income geographies was consistent with the performance in 2022 through 2023.

Small Loans to Farms

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to farms compared to the aggregate distribution of small loans to farms.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Sioux Falls MSA. CD lending had a neutral impact on the Lending Test conclusion given the bank's limited operations and the significant competition from other lenders in the Sioux Falls MSA.

Product Innovation and Flexibility

The bank made limited use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 15 loans in the amount of \$1.5 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	2	399
Chase Homebuyer Grant Loans	4	805
Homebuyer Education Grants	1	1
Veteran's Administration (VA)	1	220
Paycheck Protection Program (PPP)	7	110
Total	15	1,535

INVESTMENT TEST

The bank's performance under the Investment Test in the state of South Dakota is rated Outstanding. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 65.8 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Sioux Falls MSA	1	834	4	3,115	5	33.3	3,949	47.2	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Statewide/Regional Area										
Indirect Benefit	5	524	5	3,903	10	66.7	4,427	52.9	0	0
Total	6	1,357	9	7,019	15	100.0	8,376	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made four LIHTC investments totaling \$3.1 million that supported 134 affordable units. Qualified investments made during the evaluation period included a \$38.8 million LIHTC investment in a new affordable housing development. The project consists of 162 units restricted to individuals and families earning 60 percent or less of the AMI.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of South Dakota. Because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$4.4 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 296 affordable units and qualified grants.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Sioux Falls MSA	100.0	4	100.0	25.0	0.0	25.0	25.0	25.0	1.8	22.5	53.3	21.8	0.5
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies. The bank did not have any branches in moderate-income geographies. Examiners considered the impact of the 2020 Census changes. One moderate-income tract, where a branch is located, changed to an income tract with no income classification. Examiners further considered three branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 15 deposit taking ATMs in the AA, of which 13.3 percent were in low-income geographies and 26.7 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Sioux Falls MSA	4	0	1	1	1	1	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank entered the AA and opened four branches, of which one was in a low-income geography and one in a moderate-income geography. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank provided a relatively high-level CD services, consistent with its capacity and expertise to conduct specific activities in the Sioux Falls MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 57 qualified CD service activities to 14 organizations, for a total of 63 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and homebuyer education.

Service activities during the evaluation period include:

- JPMCB conducted 11 first-time homebuyer training sessions to 120 individuals. JPMCB partnered with a local nonprofit whose mission includes resources and support for low- and moderate-income households seeking to purchase a home.
- JPMCB partnered with 12 CCAs and assisted 40 low- or moderate-income individuals with credit counseling and debt education. JPMCB employees assisted in providing budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.

State of Tennessee

CRA Rating for the State of Tennessee: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Tennessee

Examiners assessed performance in a single AA in the state of Tennessee rating area. This AA was comprised of a portion of the Nashville-Davidson-Murfreesboro-Franklin, TN (Nashville) MSA.

The state of Tennessee is JPMCB's 31st largest rating area. As of June 30, 2023, the bank had approximately \$873.8 million in deposits in the state of Tennessee rating area, of which approximately \$851.4 million represent retail branch deposits. As of December 31, 2023, the bank operated 21 branches and 72 deposit taking ATMs in the rating area, representing 0.4 percent of total branches and 0.5 percent of total ATMs. The bank originated and purchased approximately \$3.5 billion in loans, or 0.6 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 58 banks operating 499 branches in the state rating area. JPMCB ranked 14th in deposit market share with one percent. Primary competitors include Pinnacle Bank with 21.8 percent deposit market share, Bank of America with 15.3 percent, and Regions Bank with 11 percent.

The Nashville MSA AA consists of Davidson, Maury, Rutherford, Sumner, and Williamson counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 57 banks operating 468 branches in the AA. JPMCB operated 21 branches in the AA and was ranked 14th in deposit market share with 1.1 percent. Primary competitors include Pinnacle Bank with 22.2 percent deposit market share, Bank of America with 16 percent, and Regions Bank with 11.2 percent. As of December 31, 2023, the bank operated 72 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Nashville MSA AA for each period.

Table A – Demographic Information of the Assessment Area Assessment Area: Nashville CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	327	10.1	22.3	36.7	29.4	1.5
Population by Geography	1,516,677	7.5	22.3	38.0	31.8	0.3
Housing Units by Geography	621,736	8.0	23.1	38.2	30.7	0.1
Owner-Occupied Units by Geography	367,950	3.8	16.0	41.6	38.6	0.1
Occupied Rental Units by Geography	205,818	14.3	34.6	32.8	18.3	0.0
Vacant Units by Geography	47,968	13.1	28.4	35.5	22.8	0.1
Businesses by Geography	179,709	8.0	18.5	29.3	43.4	0.8
Farms by Geography	3,846	4.1	14.2	41.4	39.7	0.5
Family Distribution by Income Level	373,556	20.0	17.1	20.1	42.8	0.0
Household Distribution by Income Level	573,768	22.2	16.5	18.1	43.3	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA		\$66,441	Median Housing Value			\$207,377
			Median Gross Rent			\$904
			Families Below Poverty Level			9.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Nashville CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	376	5.6	23.7	37.2	30.9	2.7
Population by Geography	1,750,088	4.7	21.3	39.0	33.8	1.1
Housing Units by Geography	693,155	5.3	22.6	38.8	32.4	1.0
Owner-Occupied Units by Geography	411,560	2.3	17.0	41.4	38.7	0.6
Occupied Rental Units by Geography	229,086	10.1	31.8	35.0	21.5	1.5
Vacant Units by Geography	52,509	7.2	25.7	34.8	30.5	1.7
Businesses by Geography	241,483	4.2	20.5	30.0	42.7	2.6
Farms by Geography	5,114	2.4	17.7	37.9	40.7	1.3
Family Distribution by Income Level	415,693	19.8	17.2	21.2	41.8	0.0
Household Distribution by Income Level	640,646	21.6	17.0	18.8	42.6	0.0

Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA	\$83,085	Median Housing Value	\$299,606
		Median Gross Rent	\$1,185
		Families Below Poverty Level	7.6%
<i>Source: 2020 U.S. Census and 2023 D&B Data. 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>			

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Nashville MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Nashville MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Nashville MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$831 according to 2015 ACS data and \$1,039 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,329 according to 2015 ACS data and \$1,662 according to 2020 Census data. The monthly mortgage payment for the median home in the Nashville MSA would be \$1,113 using 2015 ACS data and \$1,608 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 56.5 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Nashville MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Nashville MSA, 9.8 percent of families had incomes below the FPL according to the 2015 ACS and 7.6 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Nashville MSA was 2.4 percent compared to the Tennessee state unemployment rate of 3 percent and the national unemployment rate of 3.5 percent.

Economic Data

The economy in the Nashville area had slowed. Manufacturing and healthcare gains prevented an outright decline in employment. Nearly one-third of factory jobs in Nashville were dedicated to transportation equipment manufacturing, a share more than twice the national average. Housing inventory was low and weaker sales, brought on by high borrowing costs, were keeping listed homes on the market for longer. Over the past three years, residential real estate prices soared in Nashville, surpassing national trends. Strengths within the Nashville MSA included a favorable business tax structure, strong demographics, and a large concentration of prime-age workers. Weaknesses included

decreasing affordability, a low concentration of innovative technology producing industries, and above-average employment volatility.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, community development, and small business. Contacts noted that access to affordable housing is a significant issue in the area. Contacts noted that while the economy remained robust overall, investors were disrupting the housing market, while driving land and housing prices to higher levels. Investors purchased the limited land available with cash, leaving no land for affordable housing developments. There was a need for first-time homebuyer programs for low- and moderate-income buyers, but the inventory available was scarce. Contacts also identified financial literacy programming, loans to small businesses and affordable consumer loans as needs on the area.

Scope of Evaluation in State of Tennessee

Examiners selected the Nashville MSA for a full-scope review. There were no other AAs within the state of Tennessee. Refer to the table in appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank's performance under the Lending Test in the state of Tennessee is rated Outstanding. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Nashville MSA	6,015	28,853	237	12	35,117	100.0	100.0
Broader Statewide/Regional Area							
Direct Benefit				2	2	0.0	
Indirect Benefit				11	11	0.0	
Total	6,015	28,853	237	25	35,130	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Nashville MSA	2,900,038	340,286	2,677	246,730	3,489,731	98.7	100.00
Broader Statewide/Regional Area							
Direct Benefit				8,816	8,816	0.2	
Indirect Benefit				38,509	38,509	1.1	
Total	2,900,038	340,286	2,677	294,055	3,537,056	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.1 percent. The bank ranked 14th among 57 depository financial institutions, placing it in the top 25 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.8 percent based on the number of home mortgage loans originated or purchased. The bank ranked 32nd among 807 home mortgage lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders were Rocket Mortgage (5.2 percent), Regions Bank (4.2 percent), and Firstbank (3.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 164 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (24.8 percent), Bank of America (8.6 percent), and U.S. Bank (6.7 percent).

In overall small loans to farms for 2022, the bank had a market share of 22.1 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 29 small farm lenders in the AA. The other top lenders were John Deere Financial (15.3 percent), First National Bank (12.3 percent), and U.S. Bank (10.2 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans in moderate-income geographies.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies exceeded the percentage of farms in those geographies but was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Tennessee 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 12 CD loans totaling \$246.7 million, which represented 280.3 percent of the allocated tier 1 capital. By dollar volume, 71.7 percent of these loans funded affordable housing and 28.3 percent funded revitalization and stabilization efforts. Of the total CD loans, three were PPP loans totaling \$5.8 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- Two construction loans totaling \$68.5 million for an affordable housing development consisting of 256 low- and moderate-income units in a low-income geography of Nashville. The loans helped remediate site conditions through the state's Brownfields Redevelopment Program.
- A \$40 million construction loan to fund a new development of 228-units of multi-family housing. Of the units, 185 are covered by a project-based Section 8 HAP and restricted to 50 percent or less of AMI and the remaining 43 units are restricted to households earning 60 percent or less of AMI. A nonprofit social service partner agency will provide services from this building that will include job training, and child development and educational programming.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 613 loans in the amount of \$133 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	54	11,515
Federal Housing Administration (FHA)	19	6,045
Chase Homebuyer Grant Loans	110	37,882
Homebuyer Education Grants	23	12
Home Lending SPCP	29	12,168
Community Lending Program (Correspondent SPCP)	108	35,491
Veteran's Administration (VA)	7	2,706
VA Purchase Closing Credit	4	1,212
Business Card SPCP	43	161
Business Banking SPCP	11	1,099
Paycheck Protection Program (PPP)	205	24,728
Total	613	133,019

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Tennessee.

The bank made two CD loans totaling \$8.8 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. These loans promoted affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$38.5 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Tennessee is rated Outstanding. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 251.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made eight grants and donations, totaling \$6.1 million to five organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Nashville MSA	8	18,820	19	202,930	27	40.9	221,750	57.2	0	0
Broader Statewide/Regional Area										
Direct Benefit	3	1,486	5	43,667	8	12.1	45,153	11.6	0	0
Indirect Benefit	18	36,994	13	84,095	31	47.0	121,089	31.2	0	0
Total	29	57,301	37	330,692	66	100.0	387,993	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 95 percent of investments supported affordable housing, 2.7 percent funded community services to low- and moderate-income individuals, and 2.3 supported revitalization and stabilization efforts.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 10 LIHTC investments totaling \$191.8 million that supported 1,842 affordable housing units and one NMTC investment totaling \$5.1 million.

Qualified investments made during the evaluation period include:

- A \$36.8 million LIHTC investment for a new housing development that consisted of 238-units. All units will be restricted to individuals and families earning 60 percent or less of the AMI, with five units having a leasing preference of individuals and families earning 30 percent of the AMI and five units reserved for homeless tenants.
- A \$5.1 million NMTC investment to an anti-poverty nonprofit community services organization located in a low-income geography. The organization's programs include a food bank, health and wellness support, college and career coaching, and financial literacy. The investment provided for the demolition and new construction of one of their current facilities, and the rehabilitation of a second facility.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Tennessee. The bank made eight investments totaling \$45.2 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments included LIHTCs that supported 903 affordable housing units and grants that promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$121.1 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AA but did not have a purpose, mandate, or function to specifically serve the AA. These investments included LIHTCs that supported 2,653 affordable housing units and NMTCs.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA was excellent. Branch openings positively impacted the rating.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA *	Low	Mod	Mid	Upp	NA *
Full-Scope													
Nashville MSA	100.0	21	100.0	0	14.3	28.6	57.1	0.0	4.8	21.3	39.0	33.8	1.1
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was significantly below and in moderate-income geographies was below the percentage of the population living within those geographies. The Nashville MSA branch distribution was impacted by the 2020 Census new income designations, with a loss of one low-income branch and one moderate-income branch. Branch distribution in low- and moderate-income areas would have been higher. Examiners further considered eight branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which two were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. Bank had 72 deposit-taking ATMs in the AA, of which none were in low-income geographies and 16.7 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Nashville MSA	20	0	1	4	4	11	0
* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, the bank's opening and closing 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 opened 20 branches, of which one was in a low-income geography and four were in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch

locations in the AA. Business 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations had drive-thru services.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Nashville MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total 722 qualified CD service activities to 20 organizations, for a total of 876 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and first-time homebuyers' programs.

Service activities during the evaluation period include:

- JPMCB employees spent 80 hours working with nonprofits as part of JPMCB's Service Corps Program, impacting 50 low- and moderate-income community participants. As part of the program, the bank partnered with a nonprofit organization dedicated to the successful new beginnings of people who are returning to their communities after prison. JPMCB employees developed various tools, including a sample project plan, a tracker to manage business development contacts, and governance considerations for a satellite location. The project was awarded a Community Innovation Award from the State of Tennessee.
- JPMCB partnered with 15 CCAs and assisted 578 low- or moderate-income individuals with credit counseling and debt education. JPMCB employees assisted in providing budget counseling, debt management, housing counseling, student loan counseling, bankruptcy counseling, and financial education.

State of Texas

CRA Rating for the State of Texas: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Texas

Examiners assessed performance in 20 AAs in the state of Texas rating area. These were comprised of the majority of the Dallas-Fort Worth, TX (Dallas) CSA and Houston-The Woodlands, TX (Houston) CSA, a majority of the Beaumont-Port Arthur, TX (Beaumont) MSA, the entire Midland-Odessa, TX (Midland) CSA, the entire Austin-Round Rock-Georgetown, TX (Austin) MSA, Brownsville-Harlingen, TX (Brownsville) MSA, Laredo, TX (Laredo) MSA, McAllen-Edinburg-Mission, TX (McAllen) MSA, and Tyler, TX (Tyler) MSA, portions of the Abilene, TX (Abilene) MSA, Amarillo, TX (Amarillo) MSA, College Station-Bryan, TX (College Station) MSA, El Paso, TX (El Paso) MSA, Killeen-Temple, TX (Killeen) MSA, Longview, TX (Longview) MSA, Lubbock, TX (Lubbock) MSA, San Antonio-New Braunfels, TX (San Antonio) MSA, Waco, TX (Waco) MSA, and Wichita Falls, TX (Wichita Falls) MSA, and two counties in the non-MSA Texas AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Texas is JPMCB's third largest rating area based on deposits, branches, and lending. As of June 30, 2023, the bank had approximately \$274.8 billion in deposits in the state of Texas, of which approximately \$156.7 billion represent retail branch deposits. As of December 31, 2023, the bank operated 479 branches and 1,527 deposit taking ATMs in the state, representing 9.8 percent of total branches and 9.8 percent of total ATMs. The bank originated and purchased approximately \$47.8 billion in loans, or 7.6 percent of total bank loan originations and purchases, in the state during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 338 banks operating 6,236 branches in the state rating area. JPMCB ranked first in deposit market share with 19.5 percent. Primary competitors include Charles Schwab Bank, SSB with 19.3 percent deposit market share, Bank of America with 12.3 percent, and USAA Federal Savings Bank with 7 percent.

Dallas CSA

The Dallas CSA AA consists of Collin, Dallas, Denton, Ellis, Grayson, Hood, Hunt, Johnson, Kaufman, Navarro, Parker, Rockwall, and Tarrant counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 163 banks operating 1,447 branches in the AA. JPMCB operated 190 branches in the AA and was ranked second in deposit market share with 22 percent. Primary competitors include Bank of America with 30.4 percent deposit market share, Wells Fargo Bank with 5.4 percent, and Comerica Bank with 3.5. As of December 31, 2023, the bank operated 611 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Dallas CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Dallas CSA for Census 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,347	12.5	25.5	29.2	32.2	0.5
Population by Geography	6,934,467	10.6	24.7	30.9	33.7	0.1
Housing Units by Geography	2,659,963	10.9	23.5	31.5	33.8	0.2
Owner-Occupied Units by Geography	1,472,682	4.9	19.0	32.8	43.2	0.1
Occupied Rental Units by Geography	974,886	18.4	29.6	30.0	21.8	0.3
Vacant Units by Geography	212,395	18.4	27.0	30.2	24.1	0.3
Businesses by Geography	809,376	6.7	17.7	28.2	46.8	0.6
Farms by Geography	15,272	4.1	15.3	34.1	46.0	0.4
Family Distribution by Income Level	1,697,729	23.3	16.6	18.3	41.9	0.0
Household Distribution by Income Level	2,447,568	23.9	16.5	17.7	41.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$173,539
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$974
Median Family Income MSA - 43300 Sherman-Denison, TX MSA		\$60,873	Families Below Poverty Level			11.4%
Median Family Income Non-MSAs - TX		\$52,198				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Dallas CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,744	8.9	26.0	30.7	33.0	1.4
Population by Geography	7,818,520	8.2	25.2	31.8	34.1	0.8
Housing Units by Geography	2,900,657	8.8	25.1	32.3	32.9	0.8
Owner-Occupied Units by Geography	1,607,717	4.1	19.9	33.8	41.9	0.3
Occupied Rental Units by Geography	1,075,659	15.1	32.2	30.5	20.9	1.4
Vacant Units by Geography	217,281	13.0	28.6	30.2	26.6	1.6
Businesses by Geography	1,326,728	4.7	17.9	31.2	45.3	0.9
Farms by Geography	23,330	3.2	16.8	35.4	44.1	0.5
Family Distribution by Income Level	1,854,862	21.9	17.4	19.3	41.4	0.0
Household Distribution by Income Level	2,683,376	22.9	16.9	17.9	42.2	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$88,315	Median Housing Value			\$242,969
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$82,649	Median Gross Rent			\$1,217
Median Family Income MSA - 43300 Sherman-Denison, TX MSA		\$71,649	Families Below Poverty Level			8.2%
Median Family Income Non-MSAs - TX		\$61,785				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Dallas CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Dallas CSA, low- and some moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Dallas CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$652 to \$889 according to 2015 ACS data and from \$772 to \$1,104 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,044 to \$1,423 according to 2015 ACS data and ranging from \$1,236 to \$1,766 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Dallas CSA would be \$932 using 2015 ACS data and \$1,304 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.9 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Dallas-Plano-Irving MSA. Increases ranged from 47.6 percent to 58.8

percent for other components of the Dallas CSA. This acceleration in home prices creates new affordability concerns in the Dallas CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Dallas CSA, 11.4 percent of families had incomes below the FPL according to the 2015 ACS and 8.2 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Dallas CSA was 3.3 percent compared to 3.5 percent for both the state of Texas and the national unemployment rate.

Economic Data

Dallas-Plano-Irving, TX (Dallas) MD

Dallas experienced a slowdown in job growth. Major industries, particularly financial and professional services, saw gains surpassing national levels. Government employment lagged as workers transitioned to higher-paying private sector positions. The unemployment rate stabilized, indicating near-full employment, while labor force growth stayed well above average. Major local companies considerably expanded their workforces, aided by Dallas's lower business costs compared to other financial centers. The housing market weakened significantly, as rising mortgage rates reduced affordability. Single-family home permits dropped while multifamily construction remained robust due to high demand from job growth and an influx of young professionals. The nonresidential construction sector faced challenges from the shift toward remote work, leading to a high vacancy rate in existing office spaces.

Fort Worth-Arlington-Grapevine, TX (Fort Worth) MSA

Fort Worth economy advanced faster than the nation. Private services, especially healthcare and hospitality, led this growth, while manufacturing underperformed due to supply-chain issues. Government employment declined slightly as workers opted for better-paying jobs in the private sector. The unemployment rate dropped, reflecting full employment, and the labor force grew steadily. In healthcare, employment increased driven by the opening of a new hospital. The hospitality industry returned to pre-pandemic employment levels, while the national sector lagged. Housing data weakened as affordability worsened. Residential construction slowed as house prices plateaued and mortgage rates rose, reducing affordability. Single-family home permits began to decline, but the drop was smaller than in neighboring MSAs. Fort Worth remained more affordable, making it an attractive option for those working in Dallas.

Sherman-Denison, TX (Sherman) MSA

Sherman area economy improved, although nonfarm payroll growth slowed and lagged the national rate. Consumer industries and healthcare expanded faster than average, driven by higher wages and favorable demographics. The unemployment rate fell to near pre-pandemic lows, as the labor force surged to record levels. Manufacturing, particularly in fabricated metals and industrial machinery, benefited from the energy industry's recovery. Increased oil and gas production, driven by higher prices and global

supply gaps, boosted demand for mining products and equipment. The region's strong job recovery and population growth supported housing, as migrants from nearby metro areas moved to the Sherman MSA for more affordable living. Rising borrowing costs and an oversupply of housing cooled prices faster than in other parts of Texas. Personal income gains relative to the state average helped maintain affordability despite rising home prices. Building activity surged, but as mortgage rates climbed, demand tapered.

Community Contacts

Examiners reviewed three community contacts completed during the examination period with organizations located throughout the area. These organizations focus on affordable housing and economic development. Community contacts indicated that the following are needs identified within the community:

- Affordable rental housing
- Affordable for-sale housing
- Small business lending/micro business loans for start-up companies/micro lines of credit
- Flexible credit analysis
- Access to credit for both consumers and businesses
- Financial literacy and education
- Business deposit products for small businesses
- Bank investment in smaller nonprofits

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting CD services such as financial literacy
- Providing technical support for nonprofits to help them expand

Houston CSA

The Houston CSA AA consists of Austin, Brazoria, Fort Bend, Galveston, Harris, Montgomery, Waller, and Washington counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 72 banks operating 447 branches in the AA. JPMCB operated 159 branches in the AA and was ranked first in deposit market share with 18.6 percent. Primary competitors include Wells Fargo Bank with 12.7 percent deposit market share, Bank of America with 10.9 percent, and Woodforest National Bank with 7.8 percent. As of December 31, 2023, the bank operated 552 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Houston CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Houston CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,057	14.9	28.9	25.3	30.0	0.9
Population by Geography	6,266,152	11.7	25.7	27.6	34.6	0.4
Housing Units by Geography	2,374,672	12.3	25.0	26.9	35.5	0.3
Owner-Occupied Units by Geography	1,293,841	5.3	20.9	29.2	44.6	0.1
Occupied Rental Units by Geography	848,416	21.0	30.1	24.4	23.9	0.6
Vacant Units by Geography	232,415	19.6	28.9	23.8	27.5	0.3
Businesses by Geography	672,707	9.1	17.7	23.0	50.0	0.2
Farms by Geography	10,331	5.1	15.4	30.1	49.3	0.1
Family Distribution by Income Level	1,510,273	24.4	16.1	17.0	42.5	0.0
Household Distribution by Income Level	2,142,257	24.8	15.9	16.8	42.5	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housing Value			\$173,963
Median Family Income Non-MSAs - TX		\$52,198	Median Gross Rent			\$973
			Families Below Poverty Level			12.8%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Houston CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,590	13.5	24.7	26.5	32.2	3.1
Population by Geography	7,019,846	10.7	23.5	28.9	35.3	1.7
Housing Units by Geography	2,614,712	11.4	23.6	28.2	35.0	1.8
Owner-Occupied Units by Geography	1,442,774	5.0	19.5	30.8	43.9	0.9
Occupied Rental Units by Geography	936,857	20.1	29.7	24.5	22.7	3.1
Vacant Units by Geography	235,081	15.9	24.7	27.1	29.2	3.0
Businesses by Geography	1,151,317	8.7	18.8	25.0	45.4	2.1
Farms by Geography	16,444	5.8	17.4	30.2	45.1	1.5
Family Distribution by Income Level	1,679,627	23.5	16.6	17.9	42.0	0.0
Household Distribution by Income Level	2,379,631	24.5	15.9	16.9	42.7	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Gross Rent			\$1,172
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$81,859	Median Housing Value			\$230,203
			Families Below Poverty Level			10.6%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Houston

CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Houston CSA, low- and some moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Houston CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$652 to \$867 according to 2015 ACS data and from \$772 to \$1,023 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,044 to \$1,387 according to 2015 ACS data and ranging from \$1,236 to \$1,637 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Houston CSA would be \$934 using 2015 ACS data and \$1,236 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 38.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Houston CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Houston CSA, 12.8 percent of families had incomes below the FPL according to the 2015 ACS and 10.6 percent of families had incomes below the FPL according to the 2020 Census.

Economic Data

Employment gains in the Houston area stabilized at a pace slightly above the national average, though varied across industries. Major employment industries include professional and business services, government, and education and health services. Financial services and core manufacturing and distribution outperformed their national counterparts, while construction lagged. Homebuilding improved more than anticipated in 2023. Further, house prices began increasing in March 2023, following a decline in late 2022. The area's strengths included leadership in oil and gas technology that supports technical and professional service jobs and significant trade and export links. Weaknesses included unpredictable energy markets, contributing to the economy's volatility, and less industrial diversity compared to similarly sized metro areas.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Houston CSA was 3.8 percent compared to 3.5 percent for both the state of Texas and the national unemployment rate.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on areas such as affordable housing, small business and economic development, and community development. Contacts noted that

the Houston area was negatively impacted by both the COVID-19 pandemic and a major storm in February 2021. Economic conditions were challenging for low- and moderate-income households. There was a need for affordable and flexible mortgage products for low- and moderate-income households, including those compatible with government downpayment assistance programs. The area had a significant population of families who were unbanked and depended on check-cashing services or payday lenders. Increasing access to affordable traditional financial services was necessary, including expanding the number of physical bank branches in low- and moderate-income neighborhoods. Other needs identified included access to low-cost capital for affordable housing developers, equity investments for community-based and nonprofit community-development organizations, and access to construction financing to support affordable housing development.

Scope of Evaluation in State of Texas

Examiners selected the Dallas and Houston CSAs for full-scope review, as they represented the largest concentration of deposits, lending, and branches in the state of Texas. The CSAs combined account for 90.5 percent of the bank's adjusted deposits and 70.4 percent of lending in the state. The Abilene, Amarillo, Austin, Beaumont, Brownsville, College Station, El Paso, Killeen, Laredo, Longview, Lubbock, McAllen, San Antonio, Tyler Waco, and Wichita Falls MSAs, Midland-Odessa CSA, and non-MSA Texas AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Beaumont, College Station, and Killeen MSAs during the 2020-2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for those AAs.

JPMCB did not originate a sufficient volume of small loans to farms in the Abilene, Laredo, Longview, and Wichita Falls MSAs to conduct a meaningful analysis. Conclusions in the Lending Test for those AAs are based solely on home mortgage and small business lending.

There were no low-income geographies in the Brownsville MSA during the 2020-2021 analysis period, in the Longview MSA during the 2022 through 2023 analysis period, or in the non-MSA Texas AA during both analysis periods. All geographic conclusions were based solely on performance in moderate-income geographies.

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 Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's performance in both the Dallas CSA and Houston CSA was excellent.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Dallas CSA	38,233	179,691	1,384	199	219,507	35.0	33.4
Houston CSA	31,295	189,165	1,364	172	221,996	35.4	57.1
Limited-Scope							
Abilene MSA	402	1,056	27	0	1,485	0.2	0.1
Amarillo MSA	483	2,500	118	0	3,101	0.5	0.2
Austin MSA	14,594	69,884	526	50	85,054	13.6	4.6
Beaumont MSA	531	2,712	38	3	3,284	0.5	0.2
Brownsville MSA	417	2,901	59	3	3,380	0.5	0.2
College Station MSA	947	3,102	78	0	4,127	0.7	0.2
El Paso MSA	1,080	8,469	43	16	9,608	1.5	0.7
Killeen MSA	576	2,872	28	3	3,479	0.6	0.1
Laredo MSA	163	1,905	16	1	2,085	0.3	0.1
Longview MSA	267	1,874	17	3	2,161	0.3	0.2
Lubbock MSA	620	3,640	154	0	4,414	0.7	0
McAllen MSA	776	7,105	105	6	7,992	1.3	0.5
Midland CSA	1,006	5,059	71	1	6,137	1.0	0.3
San Antonio MSA	7,325	32,463	294	36	40,118	6.4	1.6
Tyler MSA	444	2,559	75	2	3,080	0.5	0.2
Waco MSA	536	2,383	78	1	2,998	0.5	0.1
Wichita Falls MSA	162	1,027	12	1	1,202	0.2	0.1
Non-MSA TX	246	1,504	85	0	1,835	0.3	0.1
Broader Statewide/Regional Area							
Direct Benefit				8	8	0.0	
Indirect Benefit				9	9	0.0	
Total	100,103	521,871	4,572	514	627,060	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Dallas CSA	14,673,109	3,480,696	16,593	634,097	18,804,495	39.3	33.4
Houston CSA	10,428,648	3,474,821	15,967	359,973	14,279,409	29.9	57.1
Limited-Scope							
Abilene MSA	94,053	13,904	256	0	108,213	0.2	0.1
Amarillo MSA	110,081	31,505	1,323	0	142,909	0.3	0.2
Austin MSA	6,855,244	1,272,285	5,310	404,104	8,536,943	17.9	4.6
Beaumont MSA	105,394	46,208	509	8,020	160,131	0.3	0.2
Brownsville MSA	76,202	42,439	706	13,185	132,532	0.3	0.2

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
College Station MSA	251,570	40,255	703	0	292,528	0.6	0.2
El Paso MSA	207,753	164,932	634	160,225	533,544	1.1	0.7
Killeen MSA	121,569	36,499	303	2,373	160,744	0.3	0.1
Laredo MSA	31,334	40,629	185	2,816	74,964	0.2	0.1
Longview MSA	46,556	30,748	148	5,124	82,576	0.2	0.2
Lubbock MSA	443,564	42,479	1,833	0	487,876	1.0	0
McAllen MSA	156,748	130,386	1,221	72,080	360,435	0.8	0.5
Midland CSA	287,077	84,527	714	46	372,364	0.8	0.3
San Antonio MSA	2,085,282	513,760	2,822	171,379	2,773,243	5.8	1.6
Tyler MSA	109,134	36,302	681	1,889	148,006	0.3	0.2
Waco MSA	124,208	29,793	704	1,906	156,611	0.3	0.1
Wichita Falls MSA	25,602	18,024	87	21	43,734	0.1	0.1
Non-MSA TX	95,712	21,719	1,017	0	118,448	0.2	0.1
Broader Statewide/Regional Area							
Direct Benefit				9,704	9,704	0.0	
Indirect Benefit				23,647	23,647	0.1	
Total	36,328,840	9,551,911	51,716	1,870,589	47,803,056	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dallas CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 22 percent. The bank ranked second among 163 depository financial institutions, placing it in the top 2 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 1,035 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders were Rocket Mortgage (5.7 percent), United Wholesale Mortgage (3.9 percent), and DHI Mortgage Company (3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 21.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 275 small business lenders in the AA, which placed it in the top 1 percent of lenders. The other top lenders were American Express (23.7 percent), Bank of America (10 percent), and Citibank (7.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 25.8 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 51 small farm lenders in the AA. The other top lenders were John Deere Financial (10.1 percent), Wells Fargo Bank (6.7 percent), and U.S. Bank (6.6 percent).

Houston CSA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 18.6 percent. The bank ranked first among 72 depository financial institutions.

In overall mortgage lending for 2022, the bank had a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked seventh among 839 home mortgage lenders in the AA, which placed it in the top 1 percent of lenders. The top three lenders were Rocket Mortgage (6 percent), United Wholesale Mortgage (4.7 percent), and DHI Mortgage Company (4.1 percent).

In overall small loans to businesses for 2022, the bank had a market share of 27.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked first among 175 small business lenders in the AA. The other top lenders were American Express (23.2 percent), Bank of America (10.4 percent), and Capital One (5.5 percent).

In overall small loans to farms for 2022, the bank had a market share of 37.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 34 small farm lenders in the AA. The other top lenders were Prosperity Bank (15.2 percent), Wells Fargo Bank (11.2 percent), and John Deere Financial (9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in the Dallas CSA and the Houston CSA.

Home Mortgage Loans

Refer to Table O in the 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.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied homes in those geographies but was equal to the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies was below the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the 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.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was well below the percentage of businesses in those geographies and below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of small loans to businesses in both low- and moderate-income geographies.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a to higher distributions of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the 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.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was well below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was well below the percentage of farms in those geographies but approximated the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies but was near to the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes in Dallas CSA and in Houston CSA.

Home Mortgage Loans

Refer to Table P in the 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.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of

loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

Refer to Table R in the Texas 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.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the Texas 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 farms.

Dallas CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Houston CSA

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Dallas CSA

The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The bank made 199 CD loans totaling \$634.1 million, which represented 7.1 percent of the allocated tier 1 capital. By dollar volume, 69.8 percent of these loans funded affordable housing, 29.8 percent funded revitalization and stabilization efforts, 0.8 percent funded economic development, and 0.01 percent funded community services targeted to low- and moderate-income individuals. Of the total CD loans, the bank made 175 PPP loans totaling \$139.9 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$17.5 million construction loan to support the renovation of multiple historic buildings and new development of an additional apartment building. The project has 80 units restricted to households earning 30 to 60 percent of the AMI and 11 market-rate units.
- A \$4.9 million loan to support the development of a temporary homeless shelter as part of a project that qualifies for NMTCs. The project will expand the bed capacity by 60 percent and provide approximately 20,000 additional nights of shelter per year. The shelter provides additional supportive services including case management, employment services, adult education, and children's services.

Houston CSA

The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.

The bank made 172 CD loans totaling \$360 million, which represented 7.6 percent of the allocated tier 1 capital. By dollar volume, 46.2 percent of these loans funded revitalization and stabilization efforts, 42.8 percent funded affordable housing, 10.6 percent funded community services targeted to low- and moderate-income individuals, and 0.4 percent funded economic development. Of the total CD loans, the bank made 157 PPP loans totaling \$163.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

A \$48.7 million construction loan to support the renovation of a 556-unit apartment building that qualifies for LIHTC. All units are restricted to households earning 60 percent or less of the AMI, with a local nonprofit providing on-site, supportive services.

Two loans totaling \$5 million as part of a larger NMTC financing package involving multiple lenders. The project finances the construction of a Federally Qualified Health Center that serves low-income, uninsured, and underinsured patients. The loan will fund the development of a larger clinic and allow it to serve 20,000 patients with 70,000 total visits per year. The new space will further create 55 full-time jobs and retain 106 existing full-time positions.

Product Innovation and Flexibility

Dallas CSA

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 23,152 loans in the amount of \$2.5 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	999	185,251
Federal Housing Administration (FHA)	155	43,296
Chase Homebuyer Grant Loans	661	158,305

Loan Type	Number of Loans	Dollar Amount (\$000s)
Homebuyer Education Grants	459	230
Home Lending SPCP	403	110,018
Community Lending Program (Correspondent SPCP)	473	130,954
Veteran's Administration (VA)	71	28,723
VA Purchase Closing Credit	29	12,348
Business Card SPCP	415	1,534
Business Banking SPCP	349	33,153
Small Business Administration (SBA)	156	35,770
Paycheck Protection Program (PPP)	18,982	1,744,083
Total	23,152	2,483,665

Houston CSA

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 21,576 loans in the amount of \$2.2 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	649	109,665
Federal Housing Administration (FHA)	154	39,348
Chase Homebuyer Grant Loans	500	117,718
Homebuyer Education Grants	330	165
Home Lending SPCP	704	178,595
Community Lending Program (Correspondent SPCP)	332	88,584
Veteran's Administration (VA)	61	16,959
VA Purchase Closing Credit	30	7,616
Business Card SPCP	611	2,396
Business Banking SPCP	628	61,520
Small Business Administration (SBA)	164	37,164
Paycheck Protection Program (PPP)	17,413	1,538,346
Total	21,576	2,198,076

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Texas.

The bank made eight CD loans totaling 9.7 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered an additional \$23.6 million of CD loans in the broader statewide or regional areas that include the bank's AAs but do not have a purpose, mandate, or function to specifically serve those AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews the bank's performance under the Lending Test in the Beaumont MSA, Brownsville MSA, El Paso MSA, Killeen MSA, Laredo MSA, Longview MSA, McAllen MSA, San Antonio MSA, and Waco MSA was consistent with the bank's performance in the full-scope areas. The bank's performance in the Abilene MSA, Amarillo MSA, Austin MSA, College Station MSA, Lubbock MSA, Midland CSA, Tyler MSA, and Wichita Falls MSA was weaker than the bank's performance in the full-scope areas due to lower levels of CD lending activities. Performance in the non-MSA Texas AA was weaker than the bank's performance in the full-scope area due to a lower percentage of lending in low-income geographies and no CD lending activity. Performance in the limited-scope AAs supported the overall Lending Test conclusion.

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 Outstanding. Performance in the limited-scope AAs and broader statewide or regional areas supported the overall rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope reviews, the bank's performance in the Dallas CSA and Houston CSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Dallas CSA	81	170,136	175	684,244	256	36.2	854,380	26.0	0	0
Houston CSA	71	215,142	162	585,719	233	32.9	800,861	24.4	0	0
Limited-Scope										
Abilene CSA	0	0	1	1,777	1	0.1	1,777	0.1	0	0
Amarillo MSA	2	7,215	0	0	2	0.3	7,215	0.2	0	0
Austin MSA	11	36,001	30	324,894	41	5.8	360,895	11.0	0	0
Beaumont MSA	4	8,191	1	704	5	0.7	8,895	0.3	0	0
Brownsville MSA	7	45,118	2	23,059	9	1.3	68,177	2.1	0	0
College Station MSA	3	13,912	1	754	4	0.6	14,666	0.4	0	0
El Paso MSA	14	50,426	8	59,856	22	3.1	110,282	3.4	0	0
Killeen MSA	1	7,256	1	14,384	2	0.3	21,640	0.7	0	0
Laredo MSA	1	2,754	1	17,898	2	0.3	20,652	0.6	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Longview MSA	0	0	2	10,166	2	0.3	10,166	0.3	0	0
Lubbock MSA	4	16,479	0	0	4	0.6	16,479	0.5	0	0
McAllen MSA	9	53,155	8	106,041	17	2.4	159,196	4.8	0	0
Midland CSA	2	3,612	0	0	2	0.3	3,612	0.1	0	0
San Antonio MSA	16	45,652	17	99,260	33	4.7	144,912	4.4	0	0
Tyler MSA	0	0	2	15,066	2	0.3	15,066	0.5	0	0
Waco MSA	1	6,251	7	44,080	8	1.1	50,331	1.5	0	0
Wichita Falls MSA	2	458	1	670	3	0.4	1,128	0.0	0	0
Non-MSA TX	0	0	2	4,513	2	0.3	4,513	0.1	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	20	4,819	20	2.8	4,819	0.1	0	0
Indirect Benefit	20	30,895	18	575,022	38	5.4	605,917	18.4	0	0
Total	249	712,653	459	2,572,926	708	100.0	3,285,579	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

Dallas CSA

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 9.6 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 47 grants and donations, totaling \$18.2 million to 23 organizations.

The bank exhibited excellent responsiveness to the credit and economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 61.7 percent of investments supported affordable housing, 31.6 percent funded community services to low- and moderate-income individuals, 1.2 supported revitalization and stabilization efforts, and 0.2 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 21 LIHTC investments totaling \$284.6 million that supported 2,430 affordable units and three NMTC investments totaling \$6.7 million.

Qualified investments made during the evaluation period include:

- A \$13 million LIHTC investment for the construction of a multi-family development targeting low- and moderate-income families. The project consisted of 90 units, of which 81 were offered to families earning 60 percent or less of the AMI. In addition, seven units were set aside for persons with special housing needs and those experiencing homelessness.
- A \$1.8 million NMTC investment to construct a new childcare center in a low-income geography. The center will provide holistic social services for the homeless and low-income children and

families. In addition to childcare, they will provide wraparound services including job and parenting training, housing assistance, personal resources, and educational materials.

Houston CSA

The bank had an excellent level of qualified CD investments, occasionally in a leadership position, particularly those that were not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 17 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 58 grants and donations, totaling \$11.5 million to 39 organizations.

The bank exhibited excellent responsiveness to the credit and economic development needs of the community. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 68.6 percent of investments supported affordable housing, 30.3 percent funded community services to low- and moderate-income individuals, and 1.1 percent supported revitalization and stabilization efforts.

The bank occasionally used innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 14 LIHTC investments totaling \$204.6 million that supported 2,545 affordable units and one NMTC investment totaling \$8.5 million.

Qualified investments made during the evaluation period include:

- An \$8.5 million NMTC investment for the construction of a health and wellness center in a moderate-income geography. The center will serve low-income, uninsured, and underinsured patients with primary and specialty care services. The center is also located in a USDA-designated food desert and will include a cafeteria that will be open to the public and increase the community's access to fresh and healthy foods.
- A \$35.1 million LIHTC investment for the acquisition and rehabilitation of 40 apartment buildings that consist of 278 units. The units are restricted to individuals and families earning 60 percent or less of the AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Abilene MSA, Amarillo MSA, Austin MSA, Beaumont MSA, Brownsville MSA, College Station MSA, El Paso MSA, Killeen MSA, Laredo MSA, Longview MSA, Lubbock MSA, McAllen MSA, San Antonio MSA, Tyler MSA, Waco MSA, and in non-MSA Texas AA was consistent with the bank's performance in the full-scope areas. Performance in the Midland CSA and Wichita Falls MSA was weaker than the bank's performance in the full-scope areas due to lower levels of qualified investments. Performance in the limited-scope areas supported the overall Investment Test conclusion for the state of Texas.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas supported the Investment Test rating for the state of Texas. The bank made 20 investments totaling \$4.8 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These

investments promoted community services to low- and moderate-income individuals and economic development.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$605.9 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 2,477 affordable housing units and two renewable energy tax credits.

SERVICE TEST

The bank's performance under the Service Test in the state of Texas is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Texas.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Dallas CSA and Houston CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Dallas CSA	33.4	190	39.7	3.7	22.1	30.5	42.6	1.1	8.2	25.2	31.8	34.1	0.8
Houston CSA	57.1	159	33.2	11.3	16.4	23.9	45.3	3.1	10.7	23.5	28.9	35.3	1.7
Limited-Scope													
Abilene MSA	0.1	1	0.2	0.0	100.0	0.0	0.0	0.0	4.8	28.3	32.8	33.9	0.2
Amarillo MSA	0.2	1	0.2	0.0	0.0	0.0	100.0	0.0	5.2	24.7	31.9	38.2	0.0
Austin MSA	4.6	49	10.2	6.1	18.4	34.7	40.8	0.0	6.3	24.6	36.3	30.5	2.4
Beaumont MSA	0.2	5	1.0	0.0	40.0	20.0	40.0	0.0	5.7	25.4	26.6	37.0	5.3
Brownsville MSA	0.2	3	0.6	0.0	33.3	0.0	33.3	33.3	2.1	26.4	39.5	31.1	0.9
College Station MSA	0.2	3	0.6	0.0	33.3	0.0	66.7	0.0	14.2	23.1	23.0	32.6	7.1
El Paso MSA	0.7	9	1.9	0.0	22.2	66.7	11.1	0.0	3.4	27.8	32.6	36.2	0.0
Killeen MSA	0.1	2	0.4	0.0	0.0	50.0	50.0	0.0	4.9	26.6	35.8	31.9	0.8
Laredo MSA	0.1	2	0.4	0.0	0.0	0.0	100.0	0.0	3.3	39.5	17.0	40.0	0.3

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Longview MSA	0.2	3	0.6	0.0	33.3	33.3	33.3	0.0	0.0	24.9	54.9	20.1	0.0
Lubbock MSA	0.0	2	0.4	0.0	0.0	50.0	50.0	0.0	6.8	19.3	41.7	28.1	4.1
McAllen MSA	0.5	7	1.5	0.0	28.6	28.6	42.9	0.0	5.6	20.7	40.6	30.7	2.4
Midland CSA	0.3	4	0.8	0.0	25.0	50.0	25.0	0.0	3.4	21.3	44.6	30.3	0.5
San Antonio MSA	1.6	29	6.1	6.9	24.1	20.7	48.3	0.0	6.2	28.5	31.7	33.2	0.4
Tyler MSA	0.2	4	0.8	0.0	50.0	25.0	25.0	0.0	1.9	25.7	43.0	28.5	0.9
Waco MSA	0.1	3	0.6	0.0	66.7	33.3	0.0	0.0	12.7	25.8	28.1	30.0	3.3
Wichita Falls MSA	0.1	2	0.4	0.0	0.0	100.0	0.0	0.0	4.7	23.0	57.7	14.7	0.0
Non-MSA TX	0.1	1	0.2	0.0	0.0	0.0	100.0	0.0	0.0	9.9	42.5	47.6	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

Dallas CSA

The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners considered the impact of the 2020 Census changes. One low-income tract, where four branches were located, changed to an income tract with no income classification. Examiners further considered 47 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 28 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Dallas CSA included 22 Community Branches, of which two were in low-income geographies and 15 were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 611 deposit taking ATMs in the AA, of which 4.9 percent were in low-income geographies and 29 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Houston CSA

The bank's distribution of branches in low-income geographies exceeded and moderate-income geographies was near to the percentage of the population living within those geographies. Examiners further considered 34 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 18 were within 1,000 feet of low- or moderate-income

geographies. In addition, JPMCB branches in the Houston CSA included seven Community Branches, of which four were in low-income geographies and three were in moderate-income geographies. The bank also had a Community Center Branch located in a moderate-income geography. These branches improved access and supported the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. JPMCB had 552 deposit taking ATMs in the AA, of which 15.4 percent were in low-income geographies and 19.4 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Dallas CSA	5	26	-1	-7	-3	-9	-1
Houston CSA	5	26	-2	-2	-4	-13	0
Limited-Scope							
Abilene MSA	0	1	0	-1	0	0	0
Amarillo MSA	0	0	0	0	0	0	0
Austin MSA	3	5	2	-1	-2	-1	0
Beaumont MSA	0	1	0	0	-1	0	0
Brownsville MSA	0	0	0	0	0	0	0
College Station MSA	0	0	0	0	0	0	0
El Paso TX MSA	0	2	0	-1	0	-1	0
Killeen MSA	0	0	0	0	0	0	0
Laredo MSA	0	0	0	0	0	0	0
Longview MSA	0	0	0	0	0	0	0
Lubbock MSA	1	0	0	0	0	1	0
McAllen MSA	0	0	0	0	0	0	0
Midland CSA	0	0	0	0	0	0	0
San Antonio MSA	2	8	0	-3	-2	-1	0
Tyler MSA	0	0	0	0	0	0	0
Waco MSA	1	1	0	0	0	0	0
Wichita Falls MSA	0	0	0	0	0	0	0
Non-MSA TX	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

Dallas CSA

To the extent changes have been made, the bank's opening and closing of branches generally 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 five branches, of which none were in low-income geographies, and one was in a moderate-income geography. The bank closed nine branches, of which one was in a low-income geography and eight were in moderate-income geographies. The branch closures were primarily the result of consolidation.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturday. There were 146 locations with drive-thru facilities operating under similar hours.

Houston CSA

To the extent changes have been made, 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 five branches, of which none were in low- or moderate-income geographies. The bank closed 26 branches, of which two were in low-income geographies and two were in moderate-income geographies. The branch closures were the result of consolidation.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were 110 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Dallas CSA and Houston CSA.

Dallas CSA

Bank employees provided their financial or job-specific expertise and/or technical assistance for 8,176 qualified CD service activities to 198 organizations, for a total of 21,532 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 29 bank employees spending over 2,122 hours participating on boards and committees for 29 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with workforce readiness, credit counseling, and pro bono legal assistance.

Service activities during the evaluation period include:

- JPMCB partnered with 30 CCAs and provided tailored credit counseling and debt education to 2,932 low- and moderate-income individuals. JPMCB assisted in providing budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

- JPMCB Legal employees spent 528 hours providing 91 legal assistance services to 1,905 individuals in low- and moderate-income communities. The bank's pro bono program aims to identify and connect bank Legal employees to pro bono opportunities that strengthen communities, empower families, and advocate for vulnerable individuals. Bank employees counseled clients on voting rights, immigration relief, small businesses laws and regulations, and provided counsel to clients seeking assistance.

Houston CSA

Bank employees provided their financial or job-specific expertise and/or technical assistance for 6,540 qualified CD service activities to 116 organizations, for a total of 13,554 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 16 bank employees spending over 1,278 hours participating on boards and committees for 17 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with projects supporting nonprofits who serve low- and moderate-income communities, credit counseling, and technical assistance training.

Service activities during the evaluation period include:

JPMCB partnered with 16 CCAs and provided tailored credit counseling and debt education to 3,040 low- and moderate-income individuals. JPMCB assisted in providing budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

JPMCB employees provided 97 technical assistance trainings to MDIs. JPMCB employees were matched with CDFIs and MDIs, leveraging bank employees' business acumen to support the organizational sustainability for MDIs and increase their community impact.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Abilene MSA, Austin MSA, Longview MSA, San Antonio MSA, Tyler MSA, and Waco MSA was consistent with, the bank's performance in the full-scope areas. Performance in the Amarillo MSA, Beaumont MSA, Brownsville MSA, College Station MSA, El Paso MSA, Killeen MSA, Laredo MSA, Lubbock MSA, McAllen MSA, Midland MSA, Wichita Falls MSA, and non-MSA Texas AA was weaker than the bank's performance in the full-scope areas due to lower branch distribution percentages in both low- and moderate-income geographies. Performance in limited-income geographies did not have an impact on the Service Test rating.

State of Utah

CRA Rating for the State of Utah: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB made a relatively high-level of CD loans.
- An overall adequate level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Utah

Examiners assessed performance in three AAs in the state of Utah rating area. These were comprised of a majority of the Salt Lake City-Provo-Orem, UT (Salt Lake City) CSA, the entire St. George, UT (St. George) MSA, and a portion of the Logan, UT-ID, (Logan) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Utah is JPMCB's 11th largest rating area. As of June 30, 2023, the bank had approximately \$23 billion in deposits in the state of Utah, of which approximately \$21.3 billion represent retail branch deposits. As of December 31, 2023, the bank operated 43 branches and 80 deposit taking ATMs in the area, representing 0.9 percent of total branches and 0.5 percent of total ATMs. The bank originated and purchased approximately \$5.8 billion in loans, or 0.9 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 55 banks operating 430 branches in the state rating area. JPMCB ranked eighth in deposit market share with 2.5 percent. Primary competitors include Morgan Stanley Bank, N.A. with 18.7 percent deposit market share, Ally Bank with 16.9 percent, and American Express with 14.5 percent.

Salt Lake City CSA

The Salt Lake City CSA AA consists of Davis, Salt Lake, Summit, Utah, Wasatch, and Weber counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 54 banks operating 374 branches in the AA. JPMCB operated 38 branches in the AA and was ranked eighth in deposit

market share with 2.4 percent. Primary competitors include Morgan Stanley Bank, N.A. with 18.9 percent deposit market share, Ally Bank with 17.1 percent, and American Express with 14.6 percent. As of December 31, 2023, the bank operated 72 deposit-taking ATMs in the AA. Competitors are all internet or limited purpose banks with one branch headquartered in the AA. These banks also have CRA obligations and are dependent heavily on community development activities, therefore increasing competition for these types of activities.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Salt Lake City CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Salt Lake City CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	461	4.8	20.4	42.1	31.7	1.1
Population by Geography	2,258,153	3.7	19.2	44.8	31.8	0.4
Housing Units by Geography	756,121	3.7	21.0	43.5	31.2	0.6
Owner-Occupied Units by Geography	481,515	1.3	15.0	47.1	36.4	0.3
Occupied Rental Units by Geography	218,910	9.2	34.6	39.1	16.5	0.7
Vacant Units by Geography	55,696	2.7	19.7	30.0	44.1	3.5
Businesses by Geography	258,251	3.5	16.3	40.9	38.9	0.4
Farms by Geography	4,977	2.3	13.6	45.1	38.9	0.2
Family Distribution by Income Level	524,739	18.9	17.8	22.5	40.8	0.0
Household Distribution by Income Level	700,425	21.5	16.6	20.9	41.0	0.0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$71,742	Median Housing Value			\$244,657
Median Family Income MSA - 39340 Provo-Orem, UT MSA		\$67,248	Median Gross Rent			\$950
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$71,849	Families Below Poverty Level			8.9%
Median Family Income Non-MSAs - UT		\$64,772				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Salt Lake City CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	555	2.9	18.6	47.6	29.4	1.6
Population by Geography	2,546,684	2.5	17.6	48.9	30.5	0.5
Housing Units by Geography	830,540	2.6	19.8	48.0	29.6	0.1

Table A – Demographic Information of the Assessment Area Assessment Area: Salt Lake City CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	541,562	0.6	14.2	50.9	34.3	0.0
Occupied Rental Units by Geography	230,949	7.1	33.5	44.4	14.8	0.2
Vacant Units by Geography	58,029	3.4	16.7	34.9	44.9	0.1
Businesses by Geography	441,580	2.2	13.4	46.8	37.1	0.5
Farms by Geography	8,146	1.3	13.4	48.7	36.4	0.1
Family Distribution by Income Level	571,690	17.1	18.8	23.9	40.2	0.0
Household Distribution by Income Level	772,511	20.2	17.4	21.0	41.4	0.0
Median Family Income MSA - 36260 Ogden-Clearfield, UT MSA		\$88,021	Median Housing Value			\$347,256
Median Family Income MSA - 39340 Provo-Orem, UT MSA		\$83,669	Median Gross Rent			\$1,161
Median Family Income MSA - 41620 Salt Lake City, UT MSA		\$90,360	Families Below Poverty Level			5.6%
Median Family Income Non-MSAs - UT		\$73,027				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Salt Lake City CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Salt Lake City CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Salt Lake City CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$810 to \$898 according to 2015 ACS data and from \$913 to \$1,130 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,295 to \$1,437 according to 2015 ACS data and ranging from \$1,461 to \$1,807 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Salt Lake City CSA would be \$1,313 using 2015 ACS data and \$1,864 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.9 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Salt Lake City MSA. Increases ranged from 50.4 percent to 53.6 percent for other components of the Salt Lake City CSA. This acceleration in home prices creates new affordability concerns in the Salt Lake City CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Salt Lake City CSA, 8.9 percent of families had incomes below the FPL according to the 2015 ACS and 5.6 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Salt Lake City CSA was 2.5 percent compared to 2.5 percent for the state of Utah and the national unemployment rate of 3.5 percent.

Economic Data

Ogden-Clearfield, UT (Ogden) MSA

The Ogden MSA's economy recovered after a brief downturn, with healthcare and consumer industries driving growth. However, professional and business services saw significant job cuts, and the public sector at state and local levels also reduced staffing. Federal spending supported job growth, particularly in the federal government sector. Rising interest rates slowed the housing market, reducing house price growth and new construction. Manufacturing, especially in automotive and aerospace sectors, recovered as supply chain disruptions eased. Healthcare remained a major job growth driver, supported by favorable demographics and strong demand for services due to population growth. This growth provided stable, mid-wage jobs, benefiting the broader economy, including housing.

Provo-Orem, UT (Provo) MSA

The Provo MSA had a solid economic foundation. With an aging population and a tight labor market, the area had more job openings than qualified workers. The average hourly earnings in the area were high, but they have stagnated due to strong hiring in lower-wage industries like retail. Employment in professional and technical services slowed due to rising costs, interest rates, and reduced venture capital funding, leading businesses to pause hiring and expansion plans. There was solid population growth and in-migration, particularly from young workers leaving traditional technology hubs. The influx of educated high-income workers drove retail and leisure spending and increased housing demand. Tourism also contributed to the area's economy, with leisure and hospitality employment rising above pre-pandemic levels. Record visitation has also bolstered the local economy.

Salt Lake City, UT (Salt Lake City) MSA

Salt Lake City remained a top-performing economy in the West, though growth has slowed as its expansion matures. Job gains were broad-based, with manufacturing leading. The labor market had more job openings than qualified workers, causing average hourly earnings to rise faster than the national average. The finance industry faced challenges due to rising interest rates and economic uncertainty. After a decade of rapid growth, with finance and insurance companies reduced hiring and conducted layoffs due to declining consumer demand and mortgage volume. The area's strong fiscal position provided a buffer against downturns, which supported job growth in the public sector.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on economic development and community development. Contacts indicated that there was concern that the Salt Lake City area was heading in the same direction as the San Francisco Bay area in terms of affordability. The cost of housing increased, exceeding increases in median incomes. There was a need for affordable housing development in the rural areas. Many people moved further out from Salt Lake City to find housing that was more affordable. There was a need for downpayment assistance for first-time homebuyers. Another need was for products and programs that reached unbanked and credit challenged individuals, including credit counseling services and financial education. Contacts noted that while area financial institutions were focused on making loans in low- and moderate-income communities, there was a need to make sure that the individuals and businesses in these communities are credit ready and bankable. There was a growing Latino population, with a higher percentage of unbanked or underbanked, who need programs and services. Other needs identified included gap financing, equity investments, and flexible loan products for consumers and small businesses.

Scope of Evaluation in State of Utah

Examiners selected the Salt Lake City CSA for full-scope review, as it represented the largest concentration of branches and lending in the state of Utah. The CSA accounts for 98 percent of the bank's adjusted deposits and 88.9 percent of lending in the state. The Logan and St. George MSAs received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the St. George MSA during the 2020-2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for that AA.

There were no low-income geographies in the St. George MSA. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

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 the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA was excellent.

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Salt Lake City CSA	8,606	45,917	371	28	54,922	88.9	98.0
Limited-Scope							
Logan MSA	242	1,964	68	0	2,274	3.7	0.7
St. George MSA	704	3,807	45	0	4,556	7.4	1.3
Broader Statewide/Regional Area							
Direct Benefit				1	1	0.0	
Indirect Benefit				1	1	0.0	
Total	9,552	51,688	484	30	61,754	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Salt Lake City CSA	4,304,953	920,475	3,726	135,140	5,364,294	92.3	98.0
Limited-Scope							
Logan MSA	72,805	26,409	720	0	99,934	1.7	0.7
St. George MSA	287,843	49,958	449	0	338,250	5.8	1.3
Broader Statewide/Regional Area							
Direct Benefit				21	21	0.0	
Indirect Benefit				12,215	12,215	0.2	
Total	4,665,601	996,842	4,895	147,376	5,814,714	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 2.4 percent. The bank ranked eighth among 54 depository financial institutions, placing it in the top 15 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 34th among 493 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were America First Federal Credit Union (14.2 percent), Mountain America Federal Credit Union (11.2 percent), and United Wholesale Mortgage (8 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 141 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (34.7 percent), Capital One (7.8 percent), and Citibank (5.5 percent).

In overall small loans to farms for 2022, the bank had a market share of 33.9 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 17 small farm lenders in the AA. The other top lenders were Wells Fargo Bank (22.3 percent), Zions Bankcorp, N.A. (8.9 percent), and Capital One (8 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited good 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was near to the percentage of owner-occupied homes in those geographies and equaled the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low- and moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of small loans to businesses in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank had a relatively high level of CD loans. CD lending had a positive impact the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 28 CD loans totaling \$135.1 million, which represented 6.3 percent of the allocated tier 1 capital. By dollar volume, 55 percent of these loans funded affordable housing, 27 percent funded revitalization and stabilization efforts, 17.9 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made 23 PPP loans totaling \$36.6 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$12.2 million construction to fund the development of 78 housing units for seniors and persons with physical disabilities. The units are restricted to seniors 62 or older with incomes of 25 to 50 percent of the AMI. Nine units are fully accessible for individuals with physical disabilities.
- A \$24.2 million loan to a school district to acquire energy-saving equipment for the district's buildings. Per the National Center for Education Statistics (NCES), 57 percent of the students in the district are eligible for the Federal Free or Reduced Lunch program.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 3,806 loans in the amount of \$507.1 million were funded under

the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	139	32,655
Federal Housing Administration (FHA)	11	3,940
Chase Homebuyer Grant Loans	105	35,554
Homebuyer Education Grants	30	15
Community Lending Program (Correspondent SPCP)	6	2,059
Veteran's Administration (VA)	16	7,938
VA Purchase Closing Credit	8	4,444
Business Banking SPCP	1	150
Small Business Administration (SBA)	91	36,331
Paycheck Protection Program (PPP)	3,399	384,027
Total	3,806	507,113

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Utah.

The bank made two CD loans totaling \$12.2 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These loans support community service and revitalization and stabilization efforts to provide relief for an organization due to the COVID-19 pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the St. George MSA and Logan MSA was weaker than the bank's performance Test in the full-scope area as the bank did not originate any CD loans in these AAs. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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 the state of Utah is rated Low Satisfactory. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City was adequate. Examiners considered the high level of competition for CD investments in this AA.

Number and Amount of Qualified Investments

The institution had 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. The competition for investments was significant with limited opportunities. The dollar volume of current- and prior-period investments represented 2.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 15 grants and donations, totaling \$570,600 to 11 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Salt Lake City CSA	11	12,760	93	49,293	104	72.7	62,053	55.7	0	0
Limited-Scope										
Logan MSA	1	4	4	43,370	5	3.5	43,374	38.9	0	0
St. George MSA	0	0	12	3,795	12	8.5	3,795	3.4	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	17	1,217	17	11.9	1,217	1.1	0	0
Indirect Benefit	3	262	2	688	5	3.5	950	0.9	0	0
Total	15	13,026	128	98,363	143	100.0	111,389	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and community economic development needs. Investments were responsive to identified CD needs for affordable housing. By dollar volume, 98.2 percent of investments supported affordable housing, 0.9 percent supported revitalization and stabilization efforts, 0.7 percent funded community services to low- and moderate-income individuals, and 0.2 percent supported economic development.

The bank did not use innovative and/or complex investments to support CD initiatives during this evaluation period. Qualified investments made during the evaluation period include:

- Seventy-six investments in mortgage-backed securities totaling \$48.7 million. These investments supported 152 units of affordable housing in the AA.
- A \$325,000 donation to local university program targeted to low- and moderate-income entrepreneurs seeking to expand or start a business. The donation will be used to support the funding of technical expertise and to provide capital.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Logan MSA and St. George MSA was stronger than the bank's performance in the full-scope area due to higher levels of investment activity. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion for the state of Utah.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Utah. The bank made 17 investments totaling \$1.2 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$949,929 of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 89 affordable units and two mortgage-backed securities.

SERVICE TEST

The bank's performance under the Service Test in the state of Utah is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Utah.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salt Lake City CSA was excellent.

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Salt Lake City CSA	98.0	38	88.4	5.3	10.5	60.5	23.7	0.0	2.5	17.6	48.9	30.5	0.5
Limited-Scope													
Logan MSA	0.7	2	4.7	0.0	0.0	0.0	50.0	50.0	6.2	15.6	42.4	32.6	3.2
St. George MSA	1.3	3	7.0	0.0	33.3	66.7	0.0	0.0	0.0	15.3	62.8	21.9	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners considered the impact of the 2020 Census changes. A low-income tract and a moderate-income tract, where seven branches in total were located, changed to middle-income geographies. Examiners further

considered 12 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which five were within 1,000 feet of low- or moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. The bank had 72 deposit taking ATMs in the AA, of which 2.8 percent were in low-income geographies and 13.9 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Salt Lake City CSA	0	5	-1	-2	-1	-1	0
Limited-Scope							
Logan MSA	0	0	0	0	0	0	0
St. George MSA	0	1	0	0	-1	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 did not open any branches in the AA during the evaluation period. The bank closed five branches, of which one was in a low-income geography and two were in moderate-income geographies. The branch closures resulted from reduced customer usage, proximity to other JPMCB locations, or the need to optimize market efficiency and improve customer experience.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 2:00 p.m. on Saturday. There were 32 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Salt Lake City CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 937 qualified CD service activities to 27 organizations, for a total of 1,717 hours. A majority of the bank's assistance was to organizations providing community services targeted to low-

and moderate-income individuals and families. Leadership was evident by seven bank employees spending over 129 hours participating on boards and committees for five different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial training for nonprofit organizations, credit counseling, and financial education.

Service activities during the evaluation period include:

- JPMCB employee served on the board of a nonprofit that provides emergency services to solve immediate crisis for vulnerable low- and moderate-income populations. The nonprofit provides ongoing case management services to help secure permanent housing and achieve financial stability via coaching, mentorship, and career development programs.
- JPMCB partnered with 16 CCAs to provide tailored credit counseling and debt education to 683 low- and moderate-income individuals. JPMCB assisted in providing budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the St. George MSA was consistent with the bank's performance in the full-scope area. The bank's performance in Logan MSA was weaker than the bank's performance in the full-scope area due to a lower percentage of bank branches in low- and moderate-income geographies compared to the percentage of the overall population. Performance in limited-income geographies did not have an impact on the Service Test rating.

State of Vermont

CRA Rating for the State of Vermont: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments, grants, and donations that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AA.
- Retail service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Vermont

Examiners assessed performance in a single AA in the state of Vermont rating area. This AA was comprised of a portion of the Burlington-South Burlington, VT (Burlington) MSA. Refer to appendix A for a complete listing of the counties that comprise the AA.

The state of Vermont is JPMCB's 51st largest rating area. As of June 30, 2023, the bank had approximately \$69.1 million in deposits in the state of Vermont rating area, of which approximately \$68.4 million represent retail branch deposits. As of December 31, 2023, the bank operated two branches and six deposit taking ATMs in the rating area, representing less than 0.1 percent of total branches and less than 0.1 percent of total ATMs. The bank originated and purchased approximately \$121.9 million in loans, or less than 0.1 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 13 banks operating 55 branches in the state rating area. JPMCB ranked 10th in deposit market share with one percent. Primary competitors include Manufacturers and Traders Trust Company with 38.8 percent deposit market share, TD Bank, N.A. with 24.6 percent, and Community Bank, N.A. with 9.6 percent.

The Burlington MSA AA consists of Chittenden County. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 13 banks operating 55 branches in the AA. JPMCB operated two branches in the AA and was ranked 10th in deposit market share with 1 percent. Primary competitors include Manufacturers and Traders Trust Company with 38.9 percent deposit market share, TD Bank,

N.A. with 24.7 percent, and Community Bank, N.A. with 9.6 percent. As of December 31, 2023, the bank operated six deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Burlington MSA AA for each period.

Table A – Demographic Information of the Assessment Area Assessment Area: Burlington MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	2.9	20.0	54.3	20.0	2.9
Population by Geography	159,711	1.9	17.0	55.7	25.4	0.0
Housing Units by Geography	67,027	2.0	18.7	57.0	22.3	0.0
Owner-Occupied Units by Geography	41,223	1.4	8.7	61.8	28.2	0.0
Occupied Rental Units by Geography	22,275	3.1	37.7	47.9	11.3	0.0
Vacant Units by Geography	3,529	2.0	15.5	58.7	23.8	0.0
Businesses by Geography	23,038	1.1	22.4	49.6	26.6	0.2
Farms by Geography	739	0.8	6.6	60.5	32.1	0.0
Family Distribution by Income Level	36,978	19.2	16.3	22.6	41.9	0.0
Household Distribution by Income Level	63,498	23.0	15.9	18.1	42.9	0.0
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$82,811	Median Housing Value			\$284,906
			Median Gross Rent			\$1,107
			Families Below Poverty Level			6.0%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Burlington MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	2.4	14.6	46.3	31.7	4.9
Population by Geography	168,323	3.1	14.5	54.6	26.4	1.3
Housing Units by Geography	70,460	3.3	14.9	56.3	24.0	1.5
Owner-Occupied Units by Geography	41,815	1.5	8.9	65.5	23.8	0.3
Occupied Rental Units by Geography	24,663	6.5	26.1	40.4	23.2	3.8
Vacant Units by Geography	3,982	1.7	8.4	58.3	30.8	0.8
Businesses by Geography	31,210	2.1	14.8	45.2	36.5	1.5
Farms by Geography	984	1.9	6.6	56.8	34.2	0.4
Family Distribution by Income Level	37,611	18.2	16.4	22.6	42.8	0.0
Household Distribution by Income Level	66,478	23.6	15.6	17.4	43.4	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Burlington MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income MSA - 15540 Burlington-South Burlington, VT MSA		\$95,011	Median Housing Value			\$320,457
			Median Gross Rent			\$1,295
			Families Below Poverty Level			4.9%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Burlington MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Burlington MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Burlington MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$1,035 according to 2015 ACS data and \$1,188 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,656 according to 2015 ACS data and \$1,900 according to 2020 Census data. The monthly mortgage payment for the median home in the Burlington MSA would be \$1,529 using 2015 ACS data and \$1,720 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 48.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Burlington MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Burlington MSA, 6 percent of families had incomes below the FPL according to the 2015 ACS and 4.9 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Burlington MSA was 1.8 percent compared to 2 percent for the state of Vermont and the national unemployment rate of 3.5 percent.

Economic Data

The Burlington MSA's economy was falling further behind the northeast. The area had recouped a smaller share of pandemic-related job losses than the region. Employment in manufacturing was a few percentage points below its pre-pandemic levels. Cross border travel between Vermont and Canada

improved after the reopening of the Canadian border in late 2021. Burlington is closer to Montreal, Ottawa, and Quebec City in Canada than it is to any major U.S. metro. The technology industry was growing rapidly. House price appreciation was strong but trailed the state average, though permit issuance is trending higher. The area's strengths included a highly educated workforce, high technology jobs and entrepreneurial activity, and tourism.

Community Contacts

Examiners reviewed community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing and economic development. Contacts noted that Vermont is a rural state, however most of the investment took place in Burlington, which was urbanized. There was a need for more bank investment in rural areas. Contacts noted that the labor force was declining, and the population was aging. Many of these businesses needed capital to help them grow and remain sustainable. Other needs identified include:

- Access to credit for micro-businesses with 5 or fewer employees
- Funding, including flexible credit products and technical assistance for start-up small businesses
- Affordable housing for low-income households
- Elderly and assisted living housing
- Capital to support development activities in rural communities

Scope of Evaluation in State of Vermont

Examiners selected the Burlington MSA for a full-scope review. There were no other AAs within the state of Vermont. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Burlington MSA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Burlington MSA	192	2,155	29	0	2,376	100.0	100.0

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Total	192	2,155	29	0	2,376	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Burlington MSA	96,141	25,450	278	0	121,869	100.0	100.0
Total	96,141	25,450	278	0	121,869	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of one percent. The bank ranked 10th among 13 depository financial institutions, placing it in the top 77 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 27th among 140 home mortgage lenders in the AA, which placed it in the top 20 percent of lenders. The top three lenders were New England Federal Credit Union (33.4 percent), Vermont Federal Credit Union (7.5 percent), and Citizen's Bank (4.3 percent).

In overall small loans to businesses for 2022, the bank had a market share of 17.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 61 small business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (23.8 percent), Capital One (10.2 percent), and Citibank (6.1 percent).

In overall small loans to farms for 2022, the bank had a market share of 33.3 percent based on the number of small loans to farms originated or purchased. The bank ranked first among eight small farm lenders in the AA. The other top lenders were U.S. Bank (19.1 percent), John Deere Financial (14.3 percent), and Bank of the West (9.5 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank did not originate or purchase any home mortgage loans in low-income geographies. The bank's percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to businesses in both low- and moderate-income geographies.

Lending Gap Analysis

A review of home mortgage loans and small loans to businesses, including summary reports and maps, did not identify any unexplained conspicuous lending gaps in the AA.

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was poor.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was well below the percentage of moderate-income families and significantly below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of loans to moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Burlington MSA. CD lending had a neutral effect on the Lending Test conclusion given the bank's limited operations in the AA.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 28 loans in the amount of \$6.8 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	3	725
Federal Housing Administration (FHA)	2	582
Chase Homebuyer Grant Loans	5	1,790
Homebuyer Education Grants	2	1
Paycheck Protection Program (PPP)	16	3,682
Total	28	6,780

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Vermont is rated High Satisfactory. Investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership

position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 20.4 percent of allocated tier 1 capital. Of the total qualified investments, the bank made two grants and donations, totaling \$12,700 to two organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Burlington MSA	0	0	6	1,440	6	66.7	1,440	61.6	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	2	10	2	22.2	10	0.4	0	0
Indirect Benefit	0	0	1	886	1	11.1	886	37.9	0	0
Total	0	0	9	2,337	9	100.0	2,337	100.0	0	0
* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.										

The bank exhibited adequate responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 99.1 percent of investments were MBSs supporting affordable housing and 0.9 percent funded community services to low- and moderate-income individuals.

The bank occasionally used innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made one LIHTC investment totaling \$34,603 that supported 39 affordable units.

Qualified investments made during the evaluation period include:

- Three investments in MBSs totaling \$1.4 million. These investments supported loans for five units of affordable housing within the AA.
- A \$10,000 donation to a nonprofit organization that support low- and moderate-income people to achieve economic independence. The organization provides individuals and families with food, housing support in times of crisis, and assistance with education, financial skills, and assets to build a stable future.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Vermont. The bank made two investments totaling \$10,000 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AA. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AA, examiners considered \$886,000 of current-period investments in the broader statewide or regional area that included the bank's AA but did not have a purpose, mandate, or function to specifically serve those AAs.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Burlington MSA	100.0	2	100.0	0.0	0.0	50.0	50.0	0.0	3.1	14.5	54.6	26.4	1.3
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank did not have any branches in low- and moderate-income geographies. Examiners considered the impact of the 2020 Census, which changed a moderate-income tract, where a branch was located, to an upper-income tract. Examiners further considered that this branch is located within 1,000 feet of a moderate-income geography and continued to serve residents of moderate-income geographies. This branch improved access and had a positive impact on the service delivery systems conclusion.

JPMCB did not have any ATMs in low- or moderate-income geographies. Prior to the 2020 Census change, JPMCB had three ATMs in the moderate-income geography. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Burlington MSA	2	0	0	1	0	1	0
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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. During the evaluation period, the bank entered the AA and opened two branches, of which one branch was in a moderate-income geography. However, in 2021, the geography was reclassified to an upper-income geography after 2020 Census data was released. The bank did not close any branches in the AA, during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way the inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations have drive-thru facilities.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Burlington MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 140 qualified CD service activities to 14 organizations, for a total of 154 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and small business technical assistance.

Service activities during the evaluation period include:

- JPMCB partnered with 12 CCAs to provide tailored credit counseling and debt education to 116 low- and moderate-income individuals. JPMCB supported budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.
- JPMCB partnered with a national consulting firm to provide technical assistance training to nonprofits. In total, JPMCB provided 13 hours of training that benefitted 56 low- and moderate-income individuals. The training covered strategic communication and campaign planning, training, counsel and tools to achieve greater impact. The consulting firm tailored the classes and developed specific communication plans for nonprofit partners and the bank's Relationship Officer worked with nonprofit participants to address their specific challenges and apply the training content to their specific needs.

State of Virginia

CRA Rating for the State of Virginia²⁹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Virginia

Examiners assessed performance in three AAs in the state of Virginia rating area. These were comprised of portions of the Richmond, VA (Richmond) MSA, Charlottesville, VA (Charlottesville) MSA, and Virginia Beach-Norfolk-Newport News, VA-NC (Virginia Beach) MSA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Virginia is JPMCB's 40th largest rating area. As of June 30, 2023, the bank had approximately \$360.3 million in deposits in the state of Virginia rating area, of which approximately \$342.7 million represent retail branch deposits. As of December 31, 2023, the bank operated 18 branches and 58 deposit taking ATMs in the rating area, representing 0.4 percent of total branches and 0.4 percent of total ATMs. The bank originated and purchased approximately \$1.6 billion in loans, or 0.3 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 39 banks operating 380 branches in the state rating area. JPMCB ranked 18th in deposit market share with 0.5 percent. Primary competitors include Bank of America with 35.8 percent deposit market share, Truist Bank with 19.8 percent, and Wells Fargo Bank with 16.2 percent.

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.

Richmond MSA

The Richmond MSA AA consists of Chesterfield, Hanover, Henrico counties and Richmond City. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 26 banks operating 203 branches in the AA. JPMCB operated 11 branches in the AA and was ranked 12th in deposit market share with 0.5 percent. Primary competitors include Bank of America with 46.9 percent deposit market share, Truist Bank with 16.6 percent, and Wells Fargo Bank with 14.7 percent. As of December 31, 2023, the bank operated 38 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Richmond MSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Richmond MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	224	12.5	21.9	33.0	31.7	0.9
Population by Geography	962,115	9.2	20.7	34.7	35.1	0.4
Housing Units by Geography	398,579	9.7	21.7	34.7	33.8	0.1
Owner-Occupied Units by Geography	234,715	4.5	15.8	38.1	41.5	0.0
Occupied Rental Units by Geography	131,358	17.4	30.5	29.8	22.2	0.2
Vacant Units by Geography	32,506	16.0	28.3	29.8	25.5	0.4
Businesses by Geography	126,019	6.7	21.3	31.9	39.8	0.3
Farms by Geography	2,613	3.4	15.5	38.9	42.1	0.0
Family Distribution by Income Level	232,178	20.1	17.4	19.9	42.7	0.0
Household Distribution by Income Level	366,073	22.7	16.4	18.1	42.8	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$75,183	Median Housing Value			\$228,571
			Median Gross Rent			\$1,001
			Families Below Poverty Level			8.4%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Richmond MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	9.2	23.5	35.0	30.4	1.9
Population by Geography	1,035,526	7.2	19.9	38.3	33.6	1.1
Housing Units by Geography	413,640	7.6	20.8	39.4	31.2	1.1
Owner-Occupied Units by Geography	253,358	3.3	14.7	43.4	38.1	0.5

Table A – Demographic Information of the Assessment Area Assessment Area: Richmond MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	134,537	14.9	31.0	32.4	19.8	2.0
Vacant Units by Geography	25,745	11.3	27.9	36.5	22.4	1.9
Businesses by Geography	177,983	5.7	17.9	38.1	36.6	1.6
Farms by Geography	3,555	3.3	14.8	41.7	39.4	0.8
Family Distribution by Income Level	244,398	19.9	17.9	20.3	41.8	0.0
Household Distribution by Income Level	387,895	22.9	16.7	17.3	43.0	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$91,165	Median Housing Value			\$268,001
			Median Gross Rent			\$1,167
			Families Below Poverty Level			6.5%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Richmond MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Richmond MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Richmond MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$940 according to 2015 ACS data and \$1,140 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,504 according to 2015 ACS data and \$1,823 according to 2020 Census data. The monthly mortgage payment for the median home in the Richmond MSA would be \$1,227 using 2015 ACS data and \$1,439 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 49.7 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Richmond MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Richmond MSA, 8.4 percent of families had incomes below the FPL according to the 2015 ACS and 6.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Richmond MSA was 2.9 percent compared to the state of Virginia at 2.7 percent and the national unemployment rate of 3.5 percent.

Economic Data

Richmond economy stalled. Richmond has not yet fully recouped all COVID-19 induced job losses from 2020 unlike the state of Virginia or the nation. Leisure/hospitality is the only industry that stands out as a driver, whereas all other private industries, along with the public sector, are trailing other major metropolitan areas. Labor force participation remains below pre-pandemic levels. The area's strengths include above-average per capita income, lower business costs and higher housing affordability than nearby Washington, DC, and stable, positive net migration. Weaknesses include sensitivity to strength of the economy, structural deficits and reliance on state government, and low rates of business formation. Single-family house price growth is leveling off. During the pandemic, house prices outran per capita income to an even greater extent than in the state and nation. As a result, a higher-than-average share of single-family listings are experiencing cuts to their list price.

Community Contacts

Examiners reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, community development and economic development, and financial capability. Contacts noted that there are pockets of concentrated poverty in South Richmond, the East End and Petersburg. There is an acute shortage of rental units for low- and moderate-income households and starter homes. Areas that have historically served people with lower incomes have become targets for gentrification. Identified credit and CD needs include:

- Affordable rental housing for low- and moderate-income households
- Loans for home repair and rehabilitation
- Support for small businesses
- Access to capital for small businesses including start-up capital and credit for working capital

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

Scope of Evaluation in State of Virginia

Examiners selected the Richmond MSA for full-scope review, as it represented the largest concentration of branches and lending in the state of Virginia. The MSA accounts for 73.6 percent of the bank's adjusted deposits and 57.2 percent of lending in the state. The Charlottesville MSA and Virginia Beach CSA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Virginia Beach CSA during the 2020-2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for that AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in the state of Virginia is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall state rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Richmond MSA	2,671	9,674	81	2	12,428	57.2	73.6
Limited-Scope							
Charlottesville MSA	413	1,885	48	1	2,347	10.8	14.9
Virginia Beach MSA	1,054	5,855	37	2	6,948	32.0	11.5
Total	4,138	17,414	166	5	21,723	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Richmond AA	777,894	117,324	823	23,296	919,337	57.8	73.6
Limited-Scope							
Charlottesville MSA	194,468	21,370	497	36	216,371	13.6	14.9
Virginia Beach MSA	353,811	71,846	416	27,942	454,015	28.6	11.5
Total	1,326,173	210,540	1,736	51,274	1,589,723	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 0.5 percent. The bank ranked 12th among 26 depository financial institutions, placing it in the top 46 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 32nd among 508 home mortgage lenders in the AA, which placed it in the top 7 percent of lenders. The top three lenders were Virginia Credit Union (6.5 percent), Rocket Mortgage (5.8 percent), and Truist Bank (4.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.2 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 90 small

business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (28 percent), Capital One (10.1 percent), and Bank of America (7 percent).

In overall small loans to farms for 2022, the bank had a market share of 24.7 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 14 small farm lenders in the AA, which placed it in the top 15 percent of lenders. The other top lenders were John Deere Financial (28.4 percent), U.S. Bank (12.4 percent), and Capital One (8.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of 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 tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to businesses in low-income geographies.

Small Loans to Farms

Refer to Table S in the state of 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of small loans to farms in moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans to both low- and moderate-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Virginia 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made two CD loans totaling \$23.3 million, which represented 89.6 percent of the allocated tier 1 capital. These loans supported funded affordable housing and funded the construction of 66 affordable housing units in a low-income geography. All the units are restricted to households earning 60 percent or less of the AMI. An on-site nonprofit organization will provide tenants with financial literacy, family counseling, and other supportive services.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 330 loans in the amount of \$65.1 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	35	6,746
Federal Housing Administration (FHA)	9	2,120
Chase Homebuyer Grant Loans	28	8,134
Homebuyer Education Grants	16	8
Home Lending SPCP	25	6,913
Community Lending Program (Correspondent SPCP)	126	34,588
Veteran's Administration (VA)	2	745
VA Purchase Closing Credit	1	324

Loan Type	Number of Loans	Dollar Amount (\$000s)
Business Card SPCP	38	125
Business Banking SPCP	8	510
Small Business Administration (SBA)	3	1,020
Paycheck Protection Program (PPP)	39	3,870
Total	330	65,103

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Charlottesville MSA and the Virginia Beach MSA was weaker than the bank's performance in the full-scope area. Weaker performance in the Charlottesville MSA was due to a lower level of CD lending activities and performance in the Virginia Beach MSA was weaker due to lower geographic distributions of loans. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

Refer to Tables O through T in the state of 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 Virginia is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall conclusion and investments in the broader statewide or regional areas supported the overall conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 196.7 percent of allocated tier 1 capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Richmond MSA	1	229	7	50,920	8	25.0	51,150	31.7	0	0
Limited-Scope										
Charlottesville MSA	0	0	0	0	0	0.0	0	0.0	0	0
Virginia Beach CSA	3	4,485	3	43,306	6	18.8	47,791	29.6	0	0
Broader Statewide/Regional Area										

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Direct Benefit	0	0	1	5	1	3.1	5	0.0	0	0
Indirect Benefit	6	2,120	11	60,254	17	53.1	62,374	38.7	0	0
Total	10	6,834	22	154,486	32	100.0	161,320	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing, with 100 percent of investments supporting affordable housing.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made six LIHTC investments totaling \$21.5 million that supported 524 affordable units.

Qualified investments made during the evaluation period include:

- An \$11.5 million LIHTC investment to construct an affordable housing complex. The project created 84 units of new affordable housing, with all rents restricted for those earning 60 percent or less of the AMI. Nine of the units will benefit from section 8 vouchers from the local housing authority.
- A \$29.4 million investment in a commercial MBS. The investment was used to purchase a multifamily building, which included 216 units of affordable housing. All of the units are rent restricted to those earning 60 percent or less of the AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Virginia Beach CSA was consistent with the bank's performance in the full-scope area. Performance in the Charlottesville MSA was weaker than the bank's performance in the full-scope due to the bank not making any CD investments or donations in the AA. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion for the state of Virginia.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Virginia. The bank made one donation totaling \$5,000 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This investment promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$62.4 million of in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve the AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Virginia is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Virginia.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Richmond MSA	73.6	11	61.1	9.1	0.0	63.6	27.3	0.0	7.2	19.9	38.3	33.6	1.1
Limited-Scope													
Charlottesville MSA	14.9	2	11.1	50.0	50.0	0.0	0.0	0.0	6.4	14.7	39.5	39.4	0.0
Virginia Beach CSA	11.5	5	27.8	0.0	20.0	0.0	80.0	0.0	7.8	25.9	34.9	30.7	0.7
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0% **Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies exceeded the percentage of the population in those geographies. The bank did not have any branches in moderate-income geographies. Examiners considered the impact of the 2020 Census changes. Two moderate-income tracts, where two branches were located, changed to middle- and upper-income tracts. Examiners further considered five branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which three were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Richmond MSA included a Community Branch located in a middle-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. Bank had 38 deposit taking ATMs in the AA, of which three were in low-income geographies and none were in moderate-income geographies. Changes in census tract designations resulted in seven ATMs in moderate-income census tracts being redesignated as in middle- or upper-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income

geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Richmond MSA	11	0	1	2	4	4	0
Limited-Scope							
Charlottesville MSA	1	0	0	1	0	0	0
Virginia Beach CSA	5	0	0	1	0	4	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. * The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, 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. During the evaluation period, the bank entered the AA and opened 11 branches, of which one branch was in a low-income geography and two branches in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, did 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. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. None of the branch locations offered drive-thru services.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Richmond MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 406 qualified CD service activities to 26 organizations, for a total of 559 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by two bank employees spending over 80 hours participating on boards and committees for two different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial literacy and financial education.

Service activities during the evaluation period include:

- JPMCB employee served on the board of a nonprofit organization, dedicating 60 hours of service. The organization empowers entrepreneurs with tools and technical assistance to assist small businesses.

- JPMCB partnered with six local nonprofit organizations to provide financial capability training to 242 individuals. The training topics included setting financial goals and budgets and how to prevent fraud and identity theft.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Charlottesville MSA was consistent with the bank's performance in the full-scope area. Performance in the Virginia Beach CSA was weaker than the bank's performance in the full-scope area due to a lower percentage of branch distribution in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in the limited-scope AAs did not impact the Service Test conclusion for the state of Virginia.

State of Washington

CRA Rating for the State of Washington³⁰: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall adequate geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Washington

JPMCB delineated seven AAs in the state of Washington which were comprised of the Seattle-Tacoma, WA (Seattle) CSA, Bellingham, WA (Bellingham) MSA; Kennewick-Richland-Walla Walla, WA (Kennewick) CSA, Spokane-Spokane Valley, WA (Spokane) MSA, Wenatchee, WA (Wenatchee) MSA, Yakima, WA (Yakima) MSA, and the non-MSA Washington AA. The Seattle CSA, which accounts for 88 percent of the bank's deposits in the Washington rating area, received a full-scope review. Refer to appendix A for a complete description of the AAs.

The state of Washington is JPMCB's 9th largest rating area. As of June 30, 2023, the bank had approximately \$30.2 billion in deposits in the state of Washington rating area, of which approximately \$29.4 billion represent retail branch deposits. As of December 31, 2023, the bank operated 140 branches and 266 deposit taking ATMs in the rating area, representing 2.9 percent of total branches and 1.7 percent of total ATMs. The bank originated and purchased approximately \$21 billion in loans, or 3.3 percent of total bank loan originations and purchases, in the rating during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 67 banks operating 1,282 branches in the state rating area. JPMCB ranked second in deposit market share with 15 percent. Primary competitors include Bank of America with 21.6 percent deposit market share, U.S. Bank with 10.8 percent, and Wells Fargo Bank with 9.9 percent.

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.

Seattle CSA

The Seattle CSA AA consists of Island, King, Kitsap, Lewis, Mason, Pierce, Skagit, Snohomish, and Thurston counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 52 banks operating 899 branches in the AA. JPMCB operated 108 branches in the AA and was ranked second in deposit market share with 16.5 percent. Primary competitors include Bank of America with 25.5 percent deposit market share, U.S. Bank, N.A with 11 percent, and Wells Fargo Bank with 11 percent. As of December 31, 2023, the bank operated 218 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Seattle CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Seattle CSA 2020-2021						
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	477,282	4.8	18.0	41.2	35.4	0.6
Farms by Geography	10,828	2.7	16.0	48.7	31.8	0.9
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-MSAs - WA		\$58,240				
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Seattle CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,091	3.8	21.6	44.5	28.0	1.9
Population by Geography	4,953,421	4.0	22.0	44.4	28.6	1.0
Housing Units by Geography	2,015,342	4.1	21.4	44.2	29.2	1.1
Owner-Occupied Units by Geography	1,168,367	1.8	17.2	47.7	33.0	0.3
Occupied Rental Units by Geography	720,538	7.8	28.0	38.8	23.1	2.3
Vacant Units by Geography	126,437	4.0	22.4	43.3	29.1	1.2
Businesses by Geography	677,271	4.2	18.8	41.4	34.6	1.0
Farms by Geography	14,672	2.5	17.8	48.9	30.3	0.4
Family Distribution by Income Level	1,203,421	20.0	17.9	22.0	40.1	0.0
Household Distribution by Income Level	1,888,905	22.8	16.9	18.9	41.5	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA		\$93,126	Median Housing Value			\$488,042
Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA		\$82,149	Median Gross Rent			\$1,546
Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA		\$91,125	Families Below Poverty Level			5.5%
Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA MD		\$116,853				
Median Family Income MSA - 45104 Tacoma-Lakewood, WA MD		\$88,892				
Median Family Income Non-MSAs - WA		\$70,452				
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Seattle CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Seattle CSA, low- and many moderate-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Seattle CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$728 to \$1,154 according to 2015 ACS data and from \$881 to \$1,461 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,165 to \$1,846 according to 2015 ACS data and ranging from \$1,409 to \$2,337 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Seattle CSA would be \$1,757 using 2015 ACS data and \$2,620 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 37 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Seattle MSA. Increases ranged from 43.9 percent to 53.2 percent for other components of the Seattle CSA. This acceleration in home prices creates new affordability concerns in the Seattle CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Seattle CSA, 7.6 percent of families had incomes below the FPL according to the 2015 ACS and 5.5 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Seattle CSA was 3.9 percent compared to the state of Washington at 4.6 percent and the national unemployment rate of 3.5 percent.

Economic Data

Bremerton-Silverdale-Port Orchard, WA (Bremerton) MSA

The Bremerton MSA economy faced challenges. Employment growth leveled off due to a shortage of workers and consumer industries, particularly leisure and hospitality, were struggling. The housing market also cooled, with price growth below the U.S. average. The region's economy was anchored by defense spending. However, the defense sector's income growth was limited, as military pay increases were below inflation, which affected local spending. Despite these challenges, a tight labor market and rising wages boosted consumer services and closed the gap with the national average for per capita income. Remote work trends led to population growth in MSA as more workers move from Seattle.

Mount Vernon-Anacortes, WA (Mount Vernon) MSA

The Mount Vernon MSA economy faced challenges. Employment declined, and payrolls remained below pre-pandemic levels, particularly in retail trade. Retail trade and leisure/hospitality saw setbacks due to high inflation and a slowing economy, which affected travel and accommodation services. Healthcare grew strongly, driven by increased demand for services and an aging population. The housing market was cooling, with home prices declining due to higher mortgage rates and low affordability. House prices were estimated to have been overvalued by 23 percent, contributing to affordability issues. The median family income was no longer sufficient to qualify for a typical mortgage on a median-priced home.

Olympia-Lacey-Tumwater, WA (Olympia) MSA

The Olympia MSA economy improved with payroll employment at an all-time high. Healthcare maintained robust hiring, and state government recovered. The jobless rate was below pre-pandemic levels, and the labor force was growing faster than the national average. The housing market outperformed expectations, with home price appreciation exceeding the U.S. average. The healthcare industry benefited from a rapidly growing population aged 65 and older, which drove demand for

medical services. The public sector, particularly local government, was a major contributor to job creation. Strong fiscal conditions and expanding tax bases allowed for increases in public sector payrolls. State government is a significant employer that offered higher wages compared to the private sector, which boosted local income and spending.

Seattle-Bellevue-Kent, WA (Seattle) MD

The Seattle MD's economy was steady, with employment growth outpacing the regional average despite a tight labor market. The unemployment rate remained low, and the manufacturing sector was performing well and outpaced national growth. The high-tech sector slowed, as rising interest rates dampened growth. Some tech firms announced layoffs. The housing market experienced a sharp decline, with home prices falling faster than average due to higher mortgage rates. The MSA's economy faced additional risks. Exports accounting for a significant share of the MSA's gross domestic product.

Tacoma-Lakewood, WA (Tacoma) MD

The Tacoma MD's economy slowed down, with a deceleration in nonfarm job growth due to worker shortage, particularly in the transportation industry. Unemployment dropped significantly below pre-pandemic levels, and the tight labor market drove strong wage growth, which attracted more workers. The housing market cooled due to slowed price appreciation as affordability issues dampened demand. A significant portion of the MD's workforce commuted to Seattle and benefitted from high-paying jobs. The transportation and trade sectors continued to perform well, though growth moderated as businesses completed inventory restocking. The logistics sector remained strong due to the area's warehousing capacity and links to other markets. The manufacturing sector faced challenges, as reduced capacity limited recovery.

Community Contacts

Examiner reviewed four community contacts completed during the evaluation period with organizations located throughout the area. These organizations focus on affordable housing, community development, and economic development/small business. Contacts identified the following needs within the community:

- Affordable Housing, including affordable rental housing
- Volunteers for board service
- Micro-loans and small business loans

Opportunities for participation by financial institutions include the following:

- Lending for affordable home construction
- Lending to preserve and improve existing stock of affordable housing
- Facilitating volunteer opportunities for bank employees to serve on community boards
- Facilitating or providing donations/sponsorships to support hunger relief

Scope of Evaluation in State of Washington

Examiners selected the Seattle CSA for full-scope review, as it represented the largest concentration of branches and lending in the state of Washington. The CSA accounts for 88 percent of the bank's

adjusted deposits and 81.5 percent of lending in the state. The Kennewick CSA, Bellingham, Spokane, Wenatchee, and Yakima MSAs, and the non-MSA Washington AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Wenatchee MSA during the 2020-2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for that AA.

There were no low-income geographies in the Wenatchee MSA and no low-income geographies in the Yakima MSA during the 2020-2021 analysis period. All geographic conclusions for that period were based solely on performance in moderate-income geographies in those AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

The bank's performance under the Lending Test in the state of Washington is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Seattle CSA	25,088	78,306	562	201	104,157	81.0	87.9
Limited-Scope							
Bellingham MSA	693	2,991	86	87	3,857	3.0	1.7
Kennewick MSA	856	2,973	142	158	4,129	3.2	1.7
Spokane MSA	1,745	6,423	131	133	8,432	6.6	3.9
Wenatchee MSA	361	967	49	53	1,430	1.1	0.8
Yakima MSA	449	1,266	99	103	1,917	1.5	1.3
Non-MSA WA	1,099	2,959	320	334	4,712	3.7	2.8
Total	30,291	95,885	1,389	1,069	128,634	100.0	100.00
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Seattle CSA	16,544,723	1,415,869	6,097	1,053,073	19,019,762	90.4	87.9
Limited-Scope							
Bellingham MSA	361,884	47,328	1,086	12,054	422,352	2.0	1.7
Kennewick MSA	229,605	45,142	1,967	35	276,749	1.3	1.7
Spokane MSA	477,588	90,351	1,328	60	569,327	2.7	3.9
Wenatchee MSA	158,687	14,946	714	0	174,347	0.8	0.8
Yakima MSA	94,463	26,606	1,117	14,796	136,982	0.7	1.3
Non-MSA WA	380,655	42,777	4,940	5,950	434,322	2.1	2.8
Total	18,247,605	1,683,019	17,249	1,085,968	21,033,841	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 16.5 percent. The bank ranked second among 52 depository financial institutions, placing it in the top 4 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranked 14th among 679 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Boeing Employees' Credit Union (12.4 percent), Rocket Mortgage (4.2 percent), and Caliber Home Loans (4 percent).

In overall small loans to businesses for 2022, the bank had a market share of 18.3 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 143 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were American Express (19.3 percent), Bank of America (17.8 percent), and U.S. Bank (9.3 percent).

In overall small loans to farms for 2022, the bank had a market share of 23 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 27 small farm lenders in the AA. The other top lenders were Bank of America (21.3 percent), U.S. Bank (18.7 percent), and Wells Fargo Bank (16.6 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in those geographies and was near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution on loans in moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms in low-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to farms in moderate-income geographies was below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of small loans to farms in both low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but near to the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to a higher distribution of home mortgage loans to moderate-income borrowers.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 201 CD loans totaling \$1.1 billion, which represented 39.4 percent of the allocated tier 1 capital. By dollar volume, 89.4 percent of these loans funded affordable housing and 10.5 percent funded revitalization and stabilization efforts. Of the total CD loans, the bank made 37 PPP loans totaling \$26 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$60 million loan to support the construction of a 231-unit affordable housing project located in Tacoma. All units will be restricted to residents earning 60 percent or less of the AMI. This initiative was sponsored by a local housing authority.
- A \$16.5 million loan to support the construction of a mixed-use development. This project includes 92 affordable housing units specifically designed for individuals experiencing homelessness who have substance use or mental health disorders with incomes of 30 percent or less of the AMI. A nonprofit, nationally recognized as a leader in serving chronically homeless individuals with mental health and substance abuse issues, will offer comprehensive supportive services to the residents.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 8,279 loans in the amount of \$1.3 billion were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	507	142,740
Federal Housing Administration (FHA)	31	13,820
Chase Homebuyer Grant	478	213,740
Homebuyer Education Grants	137	69
Veteran's Administration (VA)	26	11,731
VA Purchase Closing Credit	8	3,794
Business Banking SPCP	1	140
Small Business Administration (SBA)	82	27,417
Paycheck Protection Program (PPP)	6,918	623,818
Affordable Housing Preservation Program	91	273,696
Total	8,279	1,310,965

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bellingham MSA, Yakima MSA, and non-MSA Washington AA was consistent with the bank's performance in the full-scope area. Performance under the Lending Test in the Kennewick CSA, Spokane MSA, and Wenatchee MSA was weaker than the bank's performance in the full-scope area due to lower levels of CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion for the state of Washington.

Refer to Tables O through T in the state of 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. Performance in the limited-scope AAs had a neutral impact on the overall Investment Test conclusion, while investments in the broader statewide or regional areas supported the overall conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 31.6 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 28 grants and donations, totaling \$9.5 million to 16 organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Seattle CSA	45	100,769	70	744,562	115	71.0	845,331	90.9	0	0
Limited-Scope										
Bellingham MSA	5	4,473	0	0	5	3.1	4,473	0.5	0	0
Kennewick MSA	1	252	0	0	1	0.6	252	0.0	0	0
Spokane MSA	12	27,550	2	14,130	14	8.6	41,680	4.5	0	0
Wenatchee MSA	0	0	2	7,316	2	1.2	7,316	0.8	0	0
Yakima MSA	8	11,060	1	13,290	9	5.6	24,350	2.6	0	0
Non-MSA WA	5	994	0	0	5	3.1	994	0.1	0	0

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Statewide/Regional Area										
Direct Benefit	0	0	10	2,071	10	6.2	2,071	0.2	0	0
Indirect Benefit	1	3,279	0	0	1	0.6	3,279	0.4	0	0
Total	77	148,376	85	781,370	162	100.0	929,746	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i>										
<i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i>										
<i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 96.3 percent of investments supported affordable housing, 3.2 percent supported revitalization and stabilization efforts, 0.4 percent funded community services to low- and moderate-income individuals, and 0.1 percent supported economic development.

The bank made significant use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 36 LIHTC investments totaling \$689.8 million that supported 5,057 affordable units, three NMTCs totaling \$25.9 million, and one HTC totaling \$734,177.

Qualified investments made during the evaluation period include:

- A \$44 million LIHTC investment in a new construction apartment complex. The project consisted of 159 units of affordable housing targeted to individuals and families earning 60 percent or less of AMI. The project included 32 units of housing dedicated to families with children.
- A \$300,000 donation to nonprofit community development organization. The organization partners with businesses, financial institutions, government agencies, and nonprofits to advance workplace opportunities for marginalized adults. The organization serves primarily individuals with prior convictions and persons earning 50 percent or less of AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bellingham MSA, Spokane MSA, Wenatchee MSA, and Yakima MSA was consistent with the bank's performance under the Investment Test in the full-scope area. Performance in the Kennewick MSA and non-MSA Washington AA was weaker than the bank performance in the full-scope area due to lower levels of CD investments. Performance in the limited-scope AAs had a neutral impact on the Investment Test conclusion in the state of Washington.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Washington. The bank made 10 investments totaling \$2.1 million to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These

investments promoted community services to low- and moderate-income individuals and affordable housing.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$3.3 million of a prior-period LIHTC investment in the broader statewide or regional area that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs.

SERVICE TEST

The bank's performance under the Service Test in the state of Washington is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Washington.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Seattle CSA	87.9	108	77.1	4.6	22.2	45.4	26.9	0.9	4.0	22.0	44.4	28.6	1.0
Limited-Scope													
Bellingham MSA	1.7	4	2.9	25.0	25.0	25.0	25.0	0.0	0.9	21.5	52.8	23.0	1.9
Kennewick CSA	1.7	5	3.6	0.0	0.0	80.0	20.0	0.0	2.1	25.9	42.5	28.2	1.4
Spokane MSA	3.9	10	7.1	0.0	50.0	20.0	20.0	10.0	2.2	26.8	44.1	25.7	1.2
Wenatchee MSA	0.8	2	1.4	0.0	0.0	50.0	50.0	0.0	0.0	16.4	60.6	23.0	0.0
Yakima MSA	1.3	3	2.1	33.3	0.0	66.7	0.0	0.0	1.0	24.9	36.8	37.2	0.0
Non-MSA WA	2.8	8	5.7	0.0	50.0	37.5	12.5	0.0	2.7	24.1	52.8	19.8	0.6
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low- and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered 23 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which 13 were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches

in the Seattle CSA included nine Community Branches, of which one was in a low-income geography and five were in moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS including ATMs, telephone banking, online banking, and mobile banking options. Bank had 218 deposit taking ATMs in the AA, of which 6.9 percent were in low-income geographies and 25.2 percent were in moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Seattle CSA	5	32	-1	-7	-10	-8	-1
Limited-Scope							
Bellingham MSA	0	1	0	0	-1	0	0
Kennewick CSA	0	2	0	0	-1	-1	0
Spokane MSA	0	2	0	-1	-1	0	0
Wenatchee MSA	0	1	0	-1	0	0	0
Yakima MSA	0	2	0	0	0	-2	0
Non-MSA WA	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, the bank's opening and closing of branches generally 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 five branches, of which none was in a low-income geography, and one was in a moderate-income geography. The bank closed 32 branches, of which one was in a low-income geography and eight were in moderate-income geographies. One branch in a moderate-income geography was closed for low transaction volume. The remaining branch closures resulted from reduced customer usage, proximity to other JPMCB locations, or the need to optimize market efficiency and improve customer experience.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday. There were 65 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Seattle CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 3,984 qualified CD service activities to 103 organizations, for a total of 7,893 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 12 bank employees spending over 1,010 hours participating on boards and committees for 15 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with financial training and credit counseling.

Service activities during the evaluation period include:

- JPMCB partnered with 45 local nonprofits and provided 344 training instances related to financial capability training. The trainings reached 3,641 individuals. Topics covered included understanding savings, making debt payments, personal finance, and consumer rights.
- JPMCB exhibited leadership with 12 employees participating on boards of directors for nonprofits. Bank employees provided board service for 15 nonprofit organizations whose mission was to primarily serve low- and moderate-income people. The organizations had a wide variety of missions including financial literacy, affordable housing, and small business growth.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bellingham MSA and Spokane MSA was consistent with the bank's performance in the full-scope area. Performance in the Kennewick MSA, Wenatchee MSA, Yakima MSA, and non-MSA Washington was weaker than the bank's performance in full-scope area due to a lower percentage of branches in low- and moderate-income geographies compared to the population in those geographies. The bank's performance in limited-scope AAs did not impact the Service Test conclusion for the state of Washington.

State of West Virginia

CRA Rating for the State of West Virginia³¹: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall excellent geographic distribution and good borrower distribution of lending.
- The bank made an adequate level of CD loans.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of West Virginia

Examiners assessed performance in four AAs in the state of West Virginia rating area. These were comprised of a majority of the Charleston-Huntington-Ashland, WV-OH-KY (Charleston) CSA, the entire Beckley, WV (Beckley) MSA, a portion of the Morgantown, WV (Morgantown) MSA, and three counties in the non-MSA West Virginia AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of West Virginia is JPMCB's 28th largest rating area. As of June 30, 2023, the bank had approximately \$2.3 billion in deposits in the state of West Virginia rating area, of which approximately \$2.2 billion represent retail branch deposits. As of December 31, 2023, the bank operated 16 branches and 32 deposit taking ATMs in the state rating area, representing 0.3 percent of total branches and 0.2 percent of total ATMs. The bank originated and purchased approximately \$370.8 million in loans, or 0.1 percent of total bank loan originations and purchases, in the state rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 37 banks operating 241 branches in the state rating area. JPMCB ranked third in deposit market share with 10.3 percent. Primary competitors include Truist Bank with 17.9 percent deposit market share, United Bank with 16 percent, and City National Bank of West Virginia with 10 percent.

³¹ 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.

Charleston CSA

The Charleston CSA AA consists of Boone, Cabell, Clay, Jackson, Kanawha, Lincoln, Logan, Putnam, and Wayne counties, all in West Virginia. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 130 branches in the AA. JPMCB operated nine branches in the AA and was ranked fourth in deposit market share with 11.5 percent. Primary competitors include Truist Bank with 21.6 percent deposit market share, United Bank with 15.8 percent, and City National Bank of West Virginia with 12.5 percent. As of December 31, 2023, the bank operated 17 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Charleston CSA AA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	134	5.2	23.1	47.0	23.9	0.7
Population by Geography	505,417	3.0	17.1	52.8	26.5	0.6
Housing Units by Geography	237,234	3.9	17.9	52.5	25.5	0.2
Owner-Occupied Units by Geography	148,026	1.7	15.6	54.4	28.3	0.0
Occupied Rental Units by Geography	58,757	8.0	20.8	47.7	22.6	0.8
Vacant Units by Geography	30,451	6.8	23.3	52.6	17.1	0.3
Businesses by Geography	33,213	6.8	12.1	50.7	30.2	0.3
Farms by Geography	806	3.1	11.3	53.8	31.8	0.0
Family Distribution by Income Level	132,915	22.3	17.2	18.9	41.6	0.0
Household Distribution by Income Level	206,783	25.7	15.6	16.7	42.1	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$54,658	Median Housing Value			\$107,814
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA		\$54,584	Median Gross Rent			\$647
Median Family Income Non-MSAs - WV		\$48,107	Families Below Poverty Level			13.4%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	148	5.4	22.3	47.3	23.6	1.4
Population by Geography	482,198	3.4	18.9	50.8	25.9	0.9
Housing Units by Geography	238,390	3.4	20.1	50.5	24.9	1.1

Table A – Demographic Information of the Assessment Area Assessment Area: Charleston CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	143,604	1.6	17.6	52.0	27.9	1.0
Occupied Rental Units by Geography	56,713	6.8	24.4	47.2	20.3	1.3
Vacant Units by Geography	38,073	5.6	23.3	49.6	20.4	1.2
Businesses by Geography	41,329	5.3	15.2	44.5	34.4	0.6
Farms by Geography	1,103	2.6	11.7	50.3	34.2	1.2
Family Distribution by Income Level	126,888	22.9	16.5	19.6	41.0	0.0
Household Distribution by Income Level	200,317	26.4	15.2	16.4	42.0	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$60,682	Median Housing Value			\$119,586
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA		\$61,976	Median Gross Rent			\$728
Median Family Income Non-MSAs - WV		\$55,205	Families Below Poverty Level			13.7%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Charleston CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Charleston CSA, housing was generally affordable when considering both 2015 ACS and 2020 Census data.

In the Charleston MSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$601 to \$683 according to 2015 ACS data and from \$690 to \$774 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$962 to \$1,093 according to 2015 ACS data and ranging from \$1,104 to \$1,240 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Charleston CSA would be \$579 using 2015 ACS data and \$642 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 30.3 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Charleston MSA and by 38 percent in the Huntington-Ashland MSA. This acceleration in home prices creates new affordability concerns in the Charleston CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Charleston CSA, 13.4 percent of families had incomes below the FPL

according to the 2015 ACS and 13.7 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Charleston CSA was 4 percent compared to the state of West Virginia at 3.9 percent and the national unemployment rate of 3.5 percent.

Economic Data

The Charleston's economy was improving but trailed the region and nation. As of November 2023, employment was well below its pre-pandemic level. Job additions in Charleston kept pace with those of the nation between mid-2022 and mid-2023. In addition, net hiring in the second half of 2023 matched that of the nation due to further recovery in leisure/hospitality and professional/ business services. House prices rose faster than national rates but were about half as far above pre-pandemic level. Charleston's reliance on coal mining jobs was higher than all but two metro areas nationally. Government employment represented a significant portion of higher-income jobs in Charleston. Charleston's population fell in almost every year since 1980. The area's strengths included low costs of living and below-average employment volatility. Weaknesses included rapid population decline, below-average incomes, dependence on a declining coal industry, and a low quality of life with a high poverty rate.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the area. These organizations focus on economic and community development. Contacts noted that while the oil and gas industry remains in the area, it will not likely see the levels of prosperity from its peak. Ancillary businesses that supported this industry and its workers have struggled to adapt to the change. Some businesses that accommodate oil and gas workers were trying to pivot to tourism. The chemical industry was no longer at its peak and growth in jobs was limited due to increased automation. The PPP loan program had a positive impact in helping local area businesses get through the COVID-19 pandemic. There was a significant elderly population, some of whom are still working. Credit needs included home mortgage financing, working capital loans for small businesses, and safe affordable rental housing in the downtown and west side neighborhood areas.

Scope of Evaluation in State of West Virginia

Examiners selected the Charleston CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of West Virginia. The CSA accounts for 65.7 percent of the bank's adjusted deposits and 55.9 percent of lending in the state. The Beckley and Morgantown MSAs and non-MSA West Virginia AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Charleston CSA during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms is based solely on performance during the 2022 through 2023 analysis period for that AA.

JPMCB did not originate a sufficient volume of small loans to farms in Beckley and Morgantown MSAs and non-MSA West Virginia AA to conduct a meaningful analysis. Conclusions in the Lending Test for those AAs are based solely on home mortgage and small business lending.

There were no low-income geographies in the Beckley MSA or non-MSA West Virginia AA. All geographic conclusions were based solely on performance in moderate-income geographies in those AAs.

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. Performance in the limited-scope AAs lowered the overall state rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Charleston CSA	975	2,411	35	8	3,429	55.9	65.1
Limited-Scope							
Beckley MSA	231	670	8	0	909	14.8	16.4
Morgantown MSA	198	744	2	0	944	15.4	0.7
Non-MSA WV	225	605	19	2	851	13.9	17.8
Total	1,629	4,430	64	10	6,133	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Charleston CSA	154,956	54,700	367	5,494	215,517	58.1	65.1
Limited-Scope							
Beckley MSA	30,990	14,415	47	0	45,452	12.3	16.4
Morgantown MSA	49,675	9,793	8	0	59,476	16.0	0.7
Non-MSA WV	39,731	10,368	195	90	50,384	13.6	17.8
Total	275,352	89,276	617	5,584	370,829	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 11.5 percent. The bank ranked fourth among 22 depository financial institutions, placing it in the top 19 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 16th among 221 home mortgage lenders in the AA, which placed it in the top 8 percent of lenders. The top three lenders were City National Bank of WV (12.1 percent), Rocket Mortgage (7.6 percent), and PrimeLending (5.2 percent).

In overall small loans to businesses for 2022, the bank had a market share of 11.7 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 69 small business lenders in the AA, which placed it in the top 3 percent of lenders. The other top lenders were American Express (22 percent), Truist Bank (9.7 percent), and Synchrony Bank (8.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 19.4 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 12 small farm lenders in the AA, which placed it in the top 17 percent of lenders. The other top lenders were Wells Fargo Bank (26.9 percent), U.S. Bank (10.5 percent), and The Huntington National Bank (9 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in low-income geographies was near to the percentage of owner-occupied homes in those geographies and exceeded the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due to higher distributions of home mortgage loans in both low- and moderate-income geographies.

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 tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and was below the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was very poor.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentage of small loans to farms in moderate-income geographies was significantly below both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses with revenues of \$1 million or less.

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 originations and purchases of small loans to farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was adequate.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was well below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank did not originate or purchase sufficient small loans to farms to conduct a meaningful analysis.

Community Development Lending

The bank made an adequate level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made eight CD loans totaling \$5.5 million, which represented 3.6 percent of the allocated tier 1 capital. By dollar volume, 92.1 percent of these loans funded revitalization and stabilization efforts, and 7.9 percent of these loans funded economic development. Of the total CD loans, six were PPP loans totaling \$3.5 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period also included two construction loans totaling \$2 million to renovate a public library. The expansion was responsive to community needs, allowing the library to expand their provision of literacy, health, and job training services. The loan was part of a NMTC Program that has a goal of spurring revitalization efforts of low-income and impoverished communities

across the United States. The bank took a leadership role in structuring the financing for the project.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 457 loans in the amount of \$60 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	43	4,394
Federal Housing Administration (FHA)	16	2,185
Chase Homebuyer Grant Loans	30	3,144
Homebuyer Education Grants	28	14
Home Lending SPCP	1	131
Veteran's Administration (VA)	11	2,077
VA Purchase Closing Credit	3	519
Paycheck Protection Program (PPP)	325	47,571
Total	457	60,035

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Beckley MSA, Morgantown MSA, and non-MSA West Virginia AA was weaker than the bank's performance in the full-scope area due to lower geographic distributions of small loans to business and lower levels of CD lending activities. Performance in the limited-scope AAs lowered the overall Lending Test conclusion.

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. Performance in the limited-scope AAs had a neutral impact on the overall Investment Test conclusion, while investments in the broader statewide or regional areas supported the conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 22.7 percent of allocated tier 1 capital. Of the total qualified investments, the bank made four grants and donations, totaling \$13,110 to three organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Charleston CSA	4	715	17	33,826	21	42.0	34,542	62.0	0	0
Limited-Scope										
Beckley MSA	1	2	1	1,200	2	4.0	1,202	2.2	0	0
Morgantown MSA	0	0	0	0	0	0.0	0	0.0	0	0
Non-MSA WV	5	1,848	0	0	5	10.0	1,848	3.3	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	3	13	3	6.0	13	0.0	0	0
Indirect Benefit	8	3,805	11	14,331	19	38.0	18,137	32.5	0	0
Total	18	6,371	32	49,370	50	100.0	55,741	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 89.8 percent of investments supported affordable housing and 10.2 percent supported revitalization and stabilization efforts.

The bank made extensive use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made 12 LIHTC investments totaling \$30.3 million that supported 633 affordable units and one NMTC totaling \$3.5 million.

Qualified investments made during the evaluation period include:

- An \$8.8 million LIHTC investment for the construction of a multifamily property. The bank's investment created 39 units of affordable housing for low- and moderate-income individuals.
- A \$3.5 million NMTC investment for the renovation and expansion of a public library. The construction created 667 temporary construction jobs and expanded the library services such as early literacy programming and job training targeted to low- and moderate-income persons and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beckley MSA, Morgantown MSA, and non-MSA West Virginia AA was weaker than the bank's performance in the full-scope AA due to lower level of qualified investments. Performance in the limited-scope areas had a neutral impact on the overall Investment Test conclusion for the state of West Virginia.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of West Virginia. The bank made three grants totaling \$12,500 to organizations in the broader statewide or

regional area whose purpose, mandate, or function included serving the bank's AAs. These grants promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$18.1 million of current- and prior-period investment in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 1,189 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of West Virginia is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of West Virginia.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Charleston CSA	65.1	9	56.3	11.1	22.2	33.3	33.3	0.0	3.4	18.9	50.8	25.9	0.9
Limited-Scope													
Beckley MSA	16.4	4	25.0	0.0	50.0	25.0	25.0	0.0	0.0	13.8	66.9	19.3	0.0
Morgantown MSA	0.7	1	6.3	0.0	0.0	0.0	0.0	100.0	3.2	12.3	49.6	30.7	4.2
Non-MSA WV	17.7	2	12.5	0.0	0.0	50.0	50.0	0.0	0.0	7.0	53.0	40.0	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only. *The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%. **Source: 2020 U.S. Census													

The bank's distribution of branches in both low- and moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered one branch in an upper-income geography that serves residents of moderate-income geographies. In addition, JPMCB branches in the Charleston CSA included two Community Branches, of which one is in a moderate-income geography. The bank also had a Community Center Branch located in a middle-income geography. These branches improved access and had a positive impact on the service delivery systems conclusion.

JPMCB had several ADS, including ATMs, online banking, and mobile banking options. The bank had 17 deposit-taking ATMs in the AA, of which 17.6 percent were in low-income geographies and 17.6 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These branches improved access and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Charleston CSA	0	3	0	0	-3	0	0
Limited-Scope							
Beckley MSA	0	0	0	0	0	0	0
Morgantown MSA	1	0	0	0	1	0	0
Non-MSA WV	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.							

To the extent changes have been made, the bank's opening and closing of branches had 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 branches during the evaluation period. The bank closed three branches, none of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to noon. or 1:00 p.m. on Saturday. All branch locations had drive-thru facilities operating under similar hours.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Charleston CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for a total of 427 qualified CD service activities to 36 organizations, for a total of 540 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy, and homebuyer education.

Service activities during the evaluation period include:

- A JPMCB employee provided 24 hours serving on the board of a nonprofit organization that provided programs and services to low- and moderate-income individuals including workforce development, consumer credit counseling, and parenting support services. As a board member, the bank employee assisted setting the nonprofit's strategic direction, developed policies, organized programs, and conducted strategic audits.
- JPMCB partnered with 18 CCAs to provide tailored credit counseling and debt education to 266 low- and moderate-income individuals. JPMCB supported budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Beckley MSA was consistent with the bank's performance in the full-scope area. Performance in the Morgantown MSA and non-MSA West Virginia AA was weaker than the bank's performance in the full-scope area due to lower percentages of branch distribution in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of West Virginia.

State of Wisconsin

CRA Rating for the State of Wisconsin³²: Satisfactory

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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall poor geographic distribution and good borrower distribution of lending.
- JPMCB was a leader in making CD loans, which had a positive impact on the Lending Test rating.
- An overall excellent level of qualified investments, grants, and donations that demonstrated excellent responsiveness to meet the credit and CD needs in the bank's AAs.
- Retail service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Wisconsin

Examiners assessed performance in seven AAs in the state of Wisconsin rating area. These were comprised of a majority of the Milwaukee-Racine-Waukesha, WI (Milwaukee) CSA, the entire Appleton-Oshkosh-Neenah, WI (Appleton) CSA, the entire Fond du Lac, WI (Fond du Lac) MSA, portions of the Green Bay, WI (Green Bay) MSA, Madison-Janesville-Beloit, WI (Madison) CSA and Wausau-Stevens Point-Wisconsin Rapids, WI (Wausau) CSA, and one county in the non-MSA Wisconsin AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Wisconsin is JPMCB's 15th largest rating area. As of June 30, 2023, the bank had approximately \$12.4 billion in deposits in the state of Wisconsin rating area, of which approximately \$11.8 billion represent retail branch deposits. As of December 31, 2023, the bank operated 54 branches and 101 deposit taking ATMs in the rating area, representing 1.1 percent of total branches and 0.6 percent of total ATMs. The bank originated and purchased approximately \$4.1 billion in loans, or 0.7 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 114 banks operating 905 branches in the state rating area. JPMCB ranked fourth in deposit market share with 8.7 percent. Primary competitors include U.S. Bank N.A. with 22.2 percent deposit market share, BMO Harris Bank, N.A. with 14 percent, and Associated Bank, N.A. with 13.8 percent.

Milwaukee CSA

³² 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 Milwaukee CSA AA consists of Dodge, Milwaukee, Ozaukee, Racine, Walworth, Washington, and Waukesha counties. According to the FDIC Deposit Market Share Data, as of June 30, 2023, there were 58 banks operating 533 branches in the AA. JPMCB operated 31 branches in the AA and was ranked third in deposit market share with 10.6 percent. Primary competitors include U.S. Bank with 33.3 percent deposit market share, BMO Harris Bank, N.A. with 13.6 percent, and Associated Bank, N.A. with 9 percent. As of December 31, 2023, the bank operated 67 deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Milwaukee CSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee CSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	518	19.7	14.9	36.7	27.4	1.4
Population by Geography	1,956,487	14.1	13.9	39.5	32.2	0.3
Housing Units by Geography	842,609	13.4	14.1	41.0	31.2	0.2
Owner-Occupied Units by Geography	480,206	6.0	11.1	42.1	40.8	0.0
Occupied Rental Units by Geography	292,093	22.6	19.3	40.3	17.3	0.5
Vacant Units by Geography	70,310	25.6	13.3	37.1	23.5	0.5
Businesses by Geography	114,146	10.0	11.6	39.8	38.3	0.4
Farms by Geography	3,525	4.1	5.4	45.2	45.2	0.0
Family Distribution by Income Level	486,577	22.2	16.5	19.9	41.4	0.0
Household Distribution by Income Level	772,299	24.5	15.4	17.4	42.7	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$183,637
Median Family Income MSA - 39540 Racine, WI MSA		\$68,728	Median Gross Rent			\$833
Median Family Income Non-MSAs - WI		\$60,742	Families Below Poverty Level			10.5%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	548	15.5	16.4	35.8	30.1	2.2
Population by Geography	1,968,332	11.1	14.6	38.6	34.8	0.9
Housing Units by Geography	854,405	11.1	14.9	39.6	33.6	0.8
Owner-Occupied Units by Geography	485,281	4.7	11.3	41.3	42.5	0.1

Table A – Demographic Information of the Assessment Area Assessment Area: Milwaukee CSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Occupied Rental Units by Geography	303,224	19.1	20.8	39.1	19.5	1.5
Vacant Units by Geography	65,900	21.7	14.4	29.0	32.9	2.0
Businesses by Geography	199,482	9.9	14.0	36.0	39.5	0.6
Farms by Geography	5,460	5.2	7.4	39.8	47.6	0.1
Family Distribution by Income Level	486,392	21.5	17.0	20.7	40.8	0.0
Household Distribution by Income Level	788,505	24.2	15.8	17.5	42.5	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$84,829	Median Housing Value			\$206,843
Median Family Income MSA - 39540 Racine, WI MSA		\$77,503	Median Gross Rent			\$938
Median Family Income Non-MSAs - WI		\$71,740	Families Below Poverty Level			8.3%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Milwaukee CSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Milwaukee CSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Milwaukee CSA, low-income borrowers would be challenged to afford a mortgage payment ranging from \$759 to \$897 according to 2015 ACS data and from \$897 to \$1,060 according to 2020 Census data, depending on what portion of the CSA they reside in. Moderate-income borrowers would be challenged to afford a mortgage payment ranging from \$1,215 to \$1,435 according to 2015 ACS data and ranging from \$1,435 to \$1,697 according to 2020 Census data, depending on what portion of the CSA they reside in. The monthly mortgage payment for the median home in the Milwaukee CSA would be \$986 using 2015 ACS data and \$1,110 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 43.4 percent from the first quarter of 2020 to the fourth quarter of 2023 in the Milwaukee MSA and by 42.6 percent in the Racine MSA. This acceleration in home prices creates new affordability concerns in the Milwaukee CSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Milwaukee CSA, 10.5 percent of families had incomes below the FPL according to the 2015 ACS and 8.3 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Milwaukee CSA was 3 percent compared to the state of Wisconsin unemployment rate of 2.7 percent and the national unemployment rate of 3.5 percent.

Economic Data

Milwaukee-Waukesha, WI (Milwaukee) MSA

The Milwaukee MSA faced a slow economic recovery after the COVID-19 pandemic. Key industries, including healthcare and manufacturing, have stagnated. Healthcare is Milwaukee's largest industry, which plateaued despite recent growth. Manufacturing struggled, shedding jobs even though the national sector expanded. Consumer industries like retail and hospitality also stalled after initial post-pandemic recovery. The MSA's labor force rebounded to pre-pandemic levels. Homebuilding slowed despite rising prices. The MSA faced significant demographic challenges, including the highest out-migration in the state. Population decline, especially in Milwaukee County, was exacerbated by remote work trends, which reduced activity and strained housing and consumer industries.

Racine, WI (Racine) MSA

The Racine MSA's economy struggled, with employment declining faster than nearly all other Midwest metro areas. While the unemployment rate remained stable, this was due to a shrinking labor force as job seekers stopped searching. The housing market remained resilient, as prices held steady despite a rise in mortgage rates. Manufacturing stabilized but did not see significant job growth due to lower exports to Canada and higher interest rates. The loss of high-paying manufacturing jobs further impacted the area. The anticipated economic boost from Foxconn's investment had not materialized. The company scaled back its original plans, that resulted in fewer jobs and investments. Additionally, government payrolls were stagnant due to budget constraints.

Community Contacts

Examiners reviewed three community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on small business and economic development. In addition, one of the contacts included a listening session held with representatives of 14 various community development organizations serving the Milwaukee area. There were several community development and social services organizations in the AA that offered adequate opportunities to help meet area needs. Local governments had designated areas for redevelopment and used a variety of resources to increase investments in those areas including Tax Increment Financing districts, empowerment zones, CD block grants, and HOME Investment Partnership Programs. Examiners noted at least nine certified CDFIs, six HUD-approved housing counseling agencies, and one SBA Small Business Development center serving the AA.

Community contacts identified the following needs within the community:

- New affordable housing including multifamily, mixed-use, and workforce housing developments
- Transportation options for low- and moderate-income people to commute to jobs
- Financial education, including homebuyer counseling and debt management
- Affordable and flexible financing options for home purchase and home rehabilitation

- Low-cost, small dollar loans to compete with payday lenders
- Financing for small businesses

Scope of Evaluation in State of Wisconsin

Examiners selected the Milwaukee CSA for full-scope review, as it represented the largest concentration of deposits, lending, and branches in the state of Wisconsin. The CSA accounts for 73.2 percent of the bank's adjusted deposits and 62 percent of lending in the state. The Appleton, Madison, and Wausau CSAs, Fond Du Lac and Green Bay MSAs, and non-MSA Wisconsin AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the Fond du Lac and Green Bay MSAs during the 2020 through 2021 analysis period to conduct a meaningful analysis. The conclusion for small loans to farms was based solely on performance during the 2022 through 2023 analysis period for those AAs.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Wisconsin AA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

There were no low-income geographies in the non-MSA Wisconsin AA. There were no low-income geographies in the Fond Du Lac or Wausau MSA during the 2022 through 2023 analysis period and no low-income geographies in the Appleton CSA during the 2020 through 2021 analysis period. All geographic conclusions for this period were based solely on performance in moderate-income geographies in those AAs.

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 the limited-scope AAs had a neutral impact on the overall rating. CD lending in the broader statewide or regional areas supported the overall Lending Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Milwaukee CSA	8,439	26,729	285	32	35,485	62.0	73.8
Limited-Scope							
Appleton CSA	1,005	4,001	113	1	5,120	8.9	6.3

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Fond du Lac MSA	147	772	64	0	983	1.7	1.3
Green Bay MSA	807	2,232	36	2	3,077	5.4	4.0
Madison CSA	1,840	8,470	192	11	10,513	18.4	12.6
Wausau CSA	314	1,461	68	0	1,843	3.2	1.6
Non-MSA WI	73	140	20	0	233	0.4	0.4
Broader Statewide/Regional Area							
Direct Benefit				1	1		
Indirect Benefit				2	2	0.0	
Total	12,625	43,805	778	48	57,255	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Milwaukee CSA	2,365,431	431,424	2,997	87,857	2,887,709	69.7	73.8
Limited-Scope							
Appleton CSA	195,933	62,898	1,358	2,534	262,723	6.3	6.3
Fond du Lac MSA	25,993	10,418	726	0	37,137	0.9	1.3
Green Bay MSA	160,280	31,279	438	42	192,039	4.6	4.0
Madison CSA	514,931	121,974	2,296	16,799	656,000	15.8	12.6
Wausau CSA	61,107	22,638	817	0	84,562	2.0	1.6
Non-MSA WI	10,842	4,245	277	0	15,364	0.4	0.4
Broader Statewide/Regional Area							
Direct Benefit				4,286	4,286		
Indirect Benefit				7,076	7,076	0.2	
Total	3,334,517	684,876	8,909	118,594	4,146,896	100.0	100.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i>							

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 10.6 percent. The bank ranked third among 58 depository financial institutions, placing it in the top 6 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 1.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 15th among 583 home mortgage lenders in the AA, which placed it in the top 3 percent of lenders. The top three lenders were Landmark Credit Union (12.9 percent), Summit Credit Union (7.2 percent), and UW Credit Union (5.9 percent).

In overall small loans to businesses for 2022, the bank had a market share of 20.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 130 small business lenders in the AA, which placed it in the top 2 percent of lenders. The other top lenders were U.S. Bank (21.1 percent), American Express (16.2 percent), and Capital One (8.9 percent).

In overall small loans to farms for 2022, the bank had a market share of 15.7 percent based on the number of small loans to farms originated or purchased. The bank ranked second among 21 small farm lenders in the AA, which placed it in the top 10 percent of lenders. The other top lenders were U.S. Bank (26.4 percent), John Deere Financial (13.8 percent), and National Exchange Bank & Trust (8.1 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited poor 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans in both low- and moderate-income geographies exceeded both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to lower distributions of home mortgage loans in both low- and moderate-income geographies.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was poor.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies was significantly below the percentage of businesses in those geographies and was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the bank did not originate or purchase any small loans to farms in low-income geographies. The bank's percentage of small loans to farms in moderate-income geographies was significantly below the percentage of farms in those geographies and exceeded the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was stronger than the performance in 2022 through 2023 due higher distributions of small loans to farms in low- and moderate-income geographies.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited 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 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 considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

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 originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Wisconsin 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank was a leader in making CD loans. CD lending had a positive effect on the Lending Test conclusion.

Refer to the Lending Activity section for the information and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 32 CD loans totaling \$87.9 million, which represented 9.9 percent of the allocated tier 1 capital. By dollar volume, 48.2 percent of these loans funded revitalization and stabilization efforts, 44.8 percent funded affordable housing, 6.7 percent funded community services targeted to low- and moderate-income individuals, and 0.1 percent funded economic development. Of the total CD loans, the bank made 21 PPP loans totaling \$32.9 million to provide relief for organizations due to the COVID-19 pandemic.

CD loans made during the evaluation period include:

- A \$3.1 million bridge loan for a mental health clinic located in a low-income geography. This project included NMTCs and is part of the city's comprehensive plan to maintain and grow neighborhood healthcare facilities to address major public health issues, general healthcare, and ensure wellness in low-income geographies.
- A \$1.6 million loan to preserve 119 affordable housing units in a low-income geography. The responsive financing was part of the bank's innovative Affordable Housing Preservation Program, which incentivized building owners and operators to keep rental units affordable.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 3,323 loans in the amount of \$445.6 million were funded under

the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	348	52,884
Federal Housing Administration (FHA)	133	25,352
Chase Homebuyer Grant Loans	146	24,101
Homebuyer Education Grants	220	110
Home Lending SPCP	154	23,948
Community Lending Program (Correspondent SPCP)	34	5,719
Veteran's Administration (VA)	25	6,315
VA Purchase Closing Credit	8	1,330
Business Card SPCP	54	195
Business Banking SPCP	12	700
Paycheck Protection Program (PPP)	2,187	302,426
Affordable Housing Preservation Program	2	2,537
Total	3,323	445,617

Broader Statewide or Regional Lending

Broader statewide or regional CD lending supported the Lending Test rating for the state of Wisconsin.

The bank made one CD loan totaling \$4.3 million to borrowers in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. This loan promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$7.1 million of CD loans in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These CD loans were PPP loans that provided relief for organizations due to the COVID-19 pandemic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Appleton CSA and Fond du Lac MSA was consistent with the bank's performance in the full-scope area. Performance in the Madison MSA and non-MSA Wisconsin AA was stronger than the bank's performance due to stronger geographic distributions of lending. Performance in the Green Bay MSA and Wausau MSA was weaker than the bank's performance in the full-scope areas due to lower levels of CD lending activities. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test conclusion.

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. Performance in the limited-scope AAs and investments in the broader statewide or regional areas supported the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 10.1 percent of allocated tier 1 capital. Of the total qualified investments, the bank made 16 grants and donations, totaling \$3.2 million to nine organizations.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Milwaukee CSA	34	28,839	27	61,223	61	36.1	90,063	26.4	0	0
Limited-Scope										
Appleton CSA	11	9,716	2	10,371	13	7.7	20,088	5.9	0	0
Fond du Lac MSA	2	533	1	3,564	3	1.8	4,097	1.2	0	0
Green Bay MSA	2	1,249	0	0	2	1.2	1,249	0.4	0	0
Madison CSA	18	40,084	14	94,037	32	18.9	134,121	39.3	0	0
Wausau CSA	4	1,905	3	13,071	7	4.1	14,976	4.4	0	0
Non-MSA WI	0	0	1	1,903	1	0.6	1,903	0.6	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	1	8	1	0.6	8	0.0	0	0
Indirect Benefit	28	23,461	21	51,621	49	29.0	75,082	22.0	0	0
Total	99	105,789	70	235,797	169	100.0	341,586	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified CD needs for affordable housing. By dollar volume, 87.9 percent of investments supported affordable housing, 9.7 supported revitalization and stabilization efforts, 1.2 percent funded community services to low- and moderate-income individuals, and 1.2 percent supported economic development.

The bank made occasional use of innovative and/or complex investments to support CD initiatives. During this evaluation period, the bank made eight LIHTC investments totaling \$50.4 million that

supported 364 affordable units, two NMTCs totaling \$5.3 million, and one HTC totaling \$2.4 million.

Qualified investments made during the evaluation period include:

- A \$15.6 million LIHTC investment for the rehabilitation of a former elementary school into an 82-unit apartment building in a low-income geography. Of the 82 units, 67 units will target individual and families earning 60 percent or less of the AMI. Several units restricted to individuals and families earning 30 percent or less of the AMI will be targeted to veterans and their families and who require supportive services.
- A \$3.4 million NMTC investment in a local community center located in a low-income geography. The center focuses on the education, health, youth and pre-college education, homebuyer counseling, substance abuse treatment, adult day care, and elderly housing. Over 75 percent of the clients served are low- and moderate-income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Appleton CSA, Fond du Lac MSA, Madison CSA, Wausau CSA, and the non-MSA Wisconsin AA was consistent with the bank's performance in the full-scope area. Performance in the Green Bay MSA was weaker than the bank's performance in the full-scope area due to lower levels of CD investments. Performance in the limited-scope areas supported overall Investment Test conclusion for the state of Wisconsin.

Broader Statewide or Regional Investments

Investments in broader statewide or regional areas supported the Investment Test rating for the state of Wisconsin. The bank made one investment totaling \$7,701 to an organization in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. The investment promoted community services to low- and moderate-income individuals.

Additionally, because JPMCB was responsive to CD needs and opportunities in its AAs, examiners considered \$75.1 million of current- and prior-period investments in the broader statewide or regional areas that include the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 2,099 affordable units and a NMTC.

SERVICE TEST

The bank's performance under the Service Test in the state of Wisconsin is rated Outstanding. Performance in the limited-scope AAs had a neutral impact on the Service Test conclusion for the state of Wisconsin.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Milwaukee CSA	73.8	31	57.4	9.7	9.7	45.2	35.5	0.0	11.1	14.6	38.6	34.8	0.9
Limited-Scope													
Appleton CSA	6.3	5	9.3	20.0	0.0	80.0	0.0	0.0	1.3	14.3	62.6	19.9	1.8
Fond du Lac MSA	1.3	1	1.9	0.0	100.0	0.0	0.0	0.0	0.0	18.9	64.1	17.1	0.0
Green Bay MSA	4.0	5	9.3	0.0	20.0	40.0	40.0	0.0	0.6	24.0	51.2	23.8	0.4
Madison CSA	12.6	9	16.7	0.0	11.1	44.4	33.3	11.1	3.2	15.4	51.0	27.2	3.2
Wausau CSA	1.6	1	1.9	0.0	100.0	0.0	0.0	0.0	0.0	18.0	63.4	18.6	0.0
Non-MSA WI	0.4	2	3.7	0.0	50.0	50.0	0.0	0.0	0.0	32.2	67.8	0.0	0.0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.													
*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.													
**Source: 2020 U.S. Census													

The bank's distribution of branches in low-income geographies was near to and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners further considered 10 branches located in middle- or upper-income geographies that served residents of low- or moderate-income geographies, of which four were within 1,000 feet of low- or moderate-income geographies. In addition, JPMCB branches in the Milwaukee CSA included three Community Branches, of which one was in a low-income geography and two were in moderate-income geographies. These branches improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. JPMCB had 67 deposit-taking ATMs in the AA, of which 10.4 percent were in low-income geographies and 13.4 percent were in moderate-income geographies. JPMCB provided data indicated that during the evaluation period, customers in low- and moderate-income geographies increased their usage of ATMs and digital banking. These systems provided additional availability and access to banking services and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Milwaukee CSA	3	7	0	0	-3	-1	0
Limited-Scope							
Appleton CSA	0	1	0	0	-1	0	0
Fond du Lac MSA	0	0	0	0	0	0	0
Green Bay MSA	0	1	0	0	-1	0	0
Madison CSA	3	0	0	1	1	1	0
Wausau CSA	0	0	0	0	0	0	0
Non-MSA WI	0	0	0	0	0	0	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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 three branches, of which none were in low-income geographies, and one was in a moderate-income geography. The bank closed seven branches, of which none were in low-income geographies, and one was in a moderate-income geography. The branch closures were primarily the result of being in a remote location and/or difficulties with staffing.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. or 2:00 p.m. on Saturday. There were 23 locations with drive-thru facilities operating under similar hours.

Community Development Services

The bank was a leader in providing CD services, consistent with its capacity and expertise to conduct specific activities in the Milwaukee CSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for 1,255 qualified CD service activities to 54 organizations, for a total of 2,845 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. Leadership was evident by 12 bank employees spending over 450 hours participating on boards and committees for 14 different CD organizations. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling, financial literacy, and homebuyer education services.

Service activities during the evaluation period include:

- A JPMCB employee provided 81 hours serving on the board of a nonprofit organization whose mission was to inspire and empower young people, especially those in need, to reach their full potential. The organization provides low-cost to no cost academic, recreational, college and career, and health and wellness programs for young people.
- JPMCB partnered with 15 CCAs to provide credit counseling and debt education to 693 low- or moderate-income individuals. JPMCB service supported budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fond du Lac MSA, Wausau CSA, and non-MSA Wisconsin was consistent with the bank's performance in the full-scope area. Performance in the Appleton CSA, Green Bay MSA, and Madison CSA were weaker than the bank's performance in the full-scope area due to a lower percentage of branch distribution in low- and moderate-income geographies, including middle- and upper-income branches that serve low- and moderate-income geographies. The bank's performance in this limited-scope AAs did not impact the Service Test conclusion for the state of Wisconsin.

State of Wyoming

CRA Rating for the State of Wyoming: 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:

- The bank's origination and purchase of home mortgage loans, small loans to businesses, and small loans to farms had overall good geographic and borrower distributions of lending.
- JPMCB made few, if any, CD loans, which had a neutral effect on the Lending Test rating.
- An overall excellent level of qualified investments and grants that demonstrated adequate responsiveness to meet the credit and CD needs in the bank's AAs. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a positive impact on the overall Investment Test conclusion.
- Retail service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- JPMCB provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities. CD services were responsive in addressing community needs.

Description of Institution's Operations in the State of Wyoming

Examiners assessed performance in two AAs in the state of Wyoming rating area. These were comprised of the entire Cheyenne, WY (Cheyenne) MSA and one county in the non-MSA Wyoming AA. Refer to appendix A for a complete listing of the counties that comprise the AAs.

The state of Wyoming is JPMCB's 38th largest rating area. As of June 30, 2023, the bank had approximately \$424 million in deposits in the state of Wyoming rating area, of which approximately \$419.9 million represent retail branch deposits. As of December 31, 2023, the bank operated four branches and 12 deposit taking ATMs in the rating area, representing less than 0.1 percent of total branches and less than 0.1 percent of total ATMs. The bank originated and purchased approximately \$549.3 million in loans, or 0.1 percent of total bank loan originations and purchases, in the rating area during the evaluation period.

According to FDIC Deposit Market Share Data, as of June 30, 2023, there were 22 banks operating 49 branches in the state rating area. JPMCB ranked 5th in deposit market share with 7.4 percent. Primary competitors include Wells Fargo Bank with 23.1 percent deposit market share, NBH Bank with 19.5 percent, and First Interstate Bank with 13.7 percent.

Cheyenne MSA

The Cheyenne MSA AA consists of Laramie County. According to FDIC Deposit Market Share data, as of June 30, 2023, there were 18 banks operating 32 branches in the AA. JPMCB operated two branches and ranked 14th in deposit market share with 1.5 percent. Primary competitors include Wells Fargo Bank with 17.7 percent deposit market share, U.S. Bank with 13.4 percent, and ANB Bank with 12.9 percent. As of December 31, 2023, the bank operated seven deposit-taking ATMs in the AA.

The evaluation period considered demographic information from both the 2010 U.S. Census with 2015 ACS data and the 2020 U.S. Census. The following tables provide a summary of the demographics, including housing and business information, for the Cheyenne MSA for each analysis period.

Table A – Demographic Information of the Assessment Area Assessment Area: Cheyenne MSA 2020-2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	28.6	47.6	19.0	4.8
Population by Geography	95,431	0.0	27.4	51.1	21.5	0.0
Housing Units by Geography	41,256	0.0	28.4	50.1	21.5	0.0
Owner-Occupied Units by Geography	25,632	0.0	22.8	50.7	26.5	0.0
Occupied Rental Units by Geography	11,662	0.0	36.3	49.7	14.0	0.0
Vacant Units by Geography	3,962	0.0	41.5	47.7	10.9	0.0
Businesses by Geography	10,486	0.0	14.5	68.3	16.8	0.4
Farms by Geography	353	0.0	7.1	70.0	22.9	0.0
Family Distribution by Income Level	24,950	19.5	18.2	23.1	39.3	0.0
Household Distribution by Income Level	37,294	22.5	17.6	18.5	41.4	0.0
Median Family Income MSA - 16940 Cheyenne, WY MSA		\$75,732	Median Housing Value			\$183,531
			Median Gross Rent			\$845
			Families Below Poverty Level			7.1%
Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%						
* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area Assessment Area: Cheyenne MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	27	0.0	22.2	51.9	22.2	3.7
Population by Geography	100,512	0.0	17.7	54.2	28.1	0.0
Housing Units by Geography	43,841	0.0	18.6	55.2	26.2	0.0
Owner-Occupied Units by Geography	29,169	0.0	11.3	57.1	31.7	0.0
Occupied Rental Units by Geography	11,033	0.0	36.5	49.2	14.4	0.0

Table A – Demographic Information of the Assessment Area Assessment Area: Cheyenne MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Vacant Units by Geography	3,639	0.0	22.6	58.7	18.7	0.0
Businesses by Geography	29,671	0.0	64.8	22.2	12.8	0.2
Farms by Geography	547	0.0	18.1	42.8	39.1	0.0
Family Distribution by Income Level	26,128	17.3	17.9	25.0	39.7	0.0
Household Distribution by Income Level	40,202	22.9	16.0	20.1	40.9	0.0
Median Family Income MSA - 16940 Cheyenne, WY MSA		\$82,325	Median Housing Value			\$227,023
			Median Gross Rent			\$954
			Families Below Poverty Level			5.8%
Source: 2020 U.S. Census and 2023 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.						

When assessing the bank's record of mortgage lending to low- and moderate-income borrowers, examiners considered, as performance context, the relative affordability of housing within the Cheyenne MSA by comparing an estimated monthly mortgage payment using the median housing value reported by the U.S. Census to the maximum gross monthly income for low- and moderate-income borrowers. Housing is generally considered unaffordable if the calculated mortgage payment exceeds 30 percent of gross monthly income. In the Cheyenne MSA, low-income borrowers would be challenged to afford a home mortgage loan when considering both 2015 ACS and 2020 Census data.

In the Cheyenne MSA, low-income borrowers would be challenged to afford a mortgage payment exceeding \$947 according to 2015 ACS data and \$1,029 according to 2020 Census data. Moderate-income borrowers would be challenged to afford a mortgage payment exceeding \$1,515 according to 2015 ACS data and \$1,647 according to 2020 Census data. The monthly mortgage payment for the median home in the Cheyenne MSA would be \$985 using 2015 ACS data and \$1,219 using 2020 Census data.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and the historically low-interest rate environment not captured by census data. According to the FHFA HPI, home prices increased by 35.1 percent from the first quarter of 2020 to the fourth quarter of 2023. This acceleration in home prices creates new affordability concerns in the Cheyenne MSA.

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 resources to qualify for home loans than those with income above the poverty rate. Within the Cheyenne MSA, 7.1 percent of families had incomes below the FPL according to the 2015 ACS and 5.8 percent of families had incomes below the FPL according to the 2020 Census.

According to the Bureau of Labor Statistics, the December 2023 non-seasonally adjusted unemployment rate for the Cheyenne MSA was 2.6 percent compared to the state of Wyoming unemployment rate of 2.5 percent and the national unemployment rate of 3.5 percent.

Economic Data

Cheyenne's economy recovered, with job growth accelerating earlier in 2023 and surpassing national pace, although it still lagged the state. Much of the recent job growth resulted from faster-than-average increases in local government payrolls. F.E. Warren Air Force Base provided stable employment, and the U.S. Army National Guard was also a major employer. Cheyenne's military presence amounted to 8 percent of the workforce, significantly higher than state and national averages. The labor force remained weaker compared to its 2020 peak, pushing the unemployment rate below the national average. The metro area had a less favorable industry mix, with most high-paying jobs in the public sector or logistics, reliant on the volatile energy sector. Cheyenne's strengths included low business costs relative to the nation, a stable military presence, and high quality of life. Its weaknesses included few growth drivers beyond logistics and defense, poor demographics, and below-average educational attainment.

Community Contacts

Examiners reviewed two community contacts completed during the evaluation period with organizations serving the AA. These organizations focus on small business and economic development. In addition, examiners reviewed the 2021 community needs assessment for Laramie County. Contacts noted that the area was seeing an influx of new residents from coastal areas of the United States as well as from Texas, Colorado, and Oklahoma. Individuals were relocating to the area for the lower costs of living, including limited taxes. Contacts indicated that Cheyenne served as one of the major communities in the area that provides a variety of employment opportunities across many industries. In addition, it served as a primary location for small businesses and individuals seeking credit. Available housing stock is at an all-time low and affordable housing is virtually non-existent in Laramie County. Many low- and moderate-income individuals were unable to afford the median home. There was a need for affordable housing for both renters and homebuyers. The area lost about 10 percent of its small businesses due to the COVID-19 pandemic. While the economy appeared to be returning to normal many businesses such as restaurants and retail stores were having difficulties attracting workers. Other needs identified include access to affordable healthcare services, internet access, and increased transportation options.

Scope of Evaluation in State of Wyoming

Examiners selected the Cheyenne MSA for full-scope review, as it represented the largest concentration of lending in the state of Wyoming. The MSA accounts for 9.3 percent of the bank's adjusted deposits and 72.6 percent of lending in the state. The non-MSA Wyoming AA received limited-scope reviews. Refer to the table in appendix A for more information.

JPMCB did not originate a sufficient volume of small loans to farms in the non-MSA Wyoming AA to conduct a meaningful analysis. Conclusions in the Lending Test for that AA are based solely on home mortgage and small business lending.

There were no low-income geographies in the Cheyenne MSA. All geographic conclusions were based solely on performance in moderate-income geographies in that AA.

There were no low- or moderate-income geographies in the non-MSA Wyoming AA. Lending test conclusions were based solely on the borrower distribution of lending and Service Test conclusions were based on performance context.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WYOMING

LENDING TEST

The bank's performance under the Lending Test in the state of Wyoming is rated High Satisfactory. Performance in the limited-scope AAs supported the overall rating.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Cheyenne CSA	142	2,599	65	0	2,806	72.5	9.7
Limited-Scope							
Non-MSA WY	170	878	12	2	1,062	27.5	90.3
Total	312	3,477	77	2	3,868	100.0	100.0

Dollar Volume of Loans (\$000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% of State Loans	% of State Deposits
Full-Scope							
Cheyenne CSA	40,282	38,147	805	0	79,234	14.4	9.7
Limited-Scope							
Non-MSA WY	454,480	12,127	154	3,272	470,033	85.6	90.3
Total	494,762	50,274	959	3,272	549,267	100.0	100.0

Lending levels reflected excellent responsiveness to AA credit needs.

Based on June 30, 2023, FDIC deposit data, the bank had a deposit market share of 1.5 percent. The bank ranked 14th among 18 depository financial institutions, placing it in the top 78 percent of banks.

In overall mortgage lending for 2022, the bank had a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranked 32nd among 180 home mortgage lenders in the AA, which placed it in the top 18 percent of lenders. The top three lenders were First Interstate Bank (8.8 percent), Meridian Trust Federal Credit Union (7.4 percent), and Wallick and Volk (6.5 percent).

In overall small loans to businesses for 2022, the bank had a market share of 21.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked second among 64 small

business lenders in the AA, which placed it in the top 4 percent of lenders. The other top lenders were American Express (26.1 percent), Capital One (8.4 percent), and Bank of America (7.4 percent).

In overall small loans to farms for 2022, the bank had a market share of 26.4 percent based on the number of small loans to farms originated or purchased. The bank ranked first among 14 small farm lenders in the AA. The other top lenders were John Deere Financial (19.8 percent), Glacier Bank (12.1 percent), and Capital One (8.8 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Wyoming 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 considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was adequate.

For 2022 through 2023, the bank's percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Businesses

Refer to Table Q in the state of Wyoming 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

For 2022 through 2023, the percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of small loans to businesses in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the state of Wyoming 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 considering the performance context factors discussed above, the overall geographic distribution of small loans to farms was adequate.

For 2022 through 2023, the percentage of small loans to farms in moderate-income geographies exceeded both the percentage of farms in those geographies and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to the bank not originating or purchasing any small loans to farms with revenues of \$1 million or less.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was good.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families and exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

For 2020 through 2021, the bank's performance was weaker than the performance in 2022 through 2023 due to a lower distribution of home mortgage loans to low-income borrowers.

Small Loans to Businesses

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

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

For 2022 through 2023, the bank's percentage of small loans to businesses with revenues of \$1 million or less was near to the percentage of businesses with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to businesses.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Small Loans to Farms

Refer to Table T in the state of Wyoming 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 farms.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to farms was good.

For 2022 through 2023, the bank's percentage of small loans to farms with revenues of \$1 million or less was below the percentage of farms with gross annual revenues of \$1 million or less and exceeded the aggregate distribution of small loans to farms.

For 2020 through 2021, the bank's performance was consistent with the performance in 2022 through 2023.

Community Development Lending

The bank did not originate any CD loans during the evaluation period in the Cheyenne MSA. CD lending had a neutral effect on the Lending Test conclusion.

Product Innovation and Flexibility

The bank made extensive use of innovative and/or flexible lending practices in serving AA credit needs. As shown in the table below, a total of 46 loans in the amount of \$7 million were funded under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
DreaMaker	3	498
Chase Homebuyer Grant Loans	4	859
Homebuyer Education Grants	2	1
Veteran's Administration (VA)	2	1,025
VA Purchase Closing Credit	1	596
Business Card SPCP	3	16
Business Banking SPCP	1	10
Paycheck Protection Program (PPP)	30	3,962
Total	46	6,967

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the non-MSA Wyoming AA was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AAs supported the overall rating.

Refer to Tables O through T in the state of Wyoming 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 Wyoming is rated Outstanding. Performance in the limited-scope AAs and investments in the broader statewide or regional areas had a positive impact on the overall Investment Test conclusion.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The bank had an excellent level of qualified CD investments and grants, not in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current- and prior-period investments represented 26.9 percent of allocated tier 1 capital. Of the total qualified investments, the bank made one qualifying grant and donation totaling \$5,000 to one organization.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Cheyenne MSA	0	0	6	1,085	6	26.1	1,085	5.8	0	0
Limited-Scope										
Non-MSA WY	0	0	1	10,000	1	4.4	10,000	53.8	0	0
Broader Statewide/Regional Area										
Direct Benefit	0	0	2	20	2	8.7	20	0.1	0	0
Indirect Benefit	12	1,117	2	6,351	14	60.9	7,469	40.2	0	0
Total	12	1,117	11	17,457	23	100.0	18,574	100.0	0	0
<i>The table presents the data for the entire rating area. The narrative below addresses performance in full-scope area only.</i> <i>* Prior Period Investments mean investments made in a previous evaluation period that are outstanding as of the examination date.</i> <i>** Unfunded Commitments mean legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.</i>										

The bank exhibited adequate responsiveness to credit and CD needs. By dollar volume, 99.5 percent of investments were MBSs that supported affordable housing and 0.5 percent funded community services to low- and moderate-income individuals.

The bank did not use innovative and/or complex investments to support CD initiatives during the evaluation period. During the evaluation period, the bank made five Fannie Mae Guaranteed MBSs totaling \$1.1 million. These investments supported the financing of five affordable single-family homes.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the non-MSA Wyoming AA was consistent with the bank's performance in the full-scope area. The bank's performance in the limited-scope AA supported the Investment Test conclusion for the state of Wyoming.

Broader Statewide or Regional Investments

Investments in the broader statewide or regional areas positively impacted the overall Investment Test rating for the state of Wyoming. The bank made two investments totaling \$20,000 to organizations in the broader statewide or regional area whose purpose, mandate, or function included serving the bank's AAs. These investments promoted community services to low- and moderate-income individuals.

Additionally, because the bank was responsive to CD needs and opportunities in its AAs, examiners considered \$7.5 million of current- and prior-period investments in the broader statewide or regional areas that included the bank's AAs but did not have a purpose, mandate, or function to specifically serve those AAs. These investments included LIHTCs that supported 391 affordable housing units.

SERVICE TEST

The bank's performance under the Service Test in the state of Wyoming is rated High Satisfactory. Performance in the limited-scope AA had a neutral impact on the Service Test conclusion for the state of Wyoming.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography**				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Full-Scope													
Cheyenne MSA	9.7	2	50	0.0	0.0	100.0	0.0	0.0	0.0	17.7	54.2	28.1	0.0
Limited-Scope													
Non-MSA WY	90.3	2	50	0.0	0.0	100.0	0.0	0.0	0.0	0.0	35.0	65.1	0.0
<i>The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.</i> <i>*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.</i> <i>**Source: 2020 U.S. Census</i>													

The bank did not have any branches in low-income or in moderate-income geographies. Examiners considered a branch located in a middle-income geography that served residents of a moderate-income geography. This branch improved access and had a positive impact on the service delivery systems conclusion.

The bank had several ADS including ATMs, telephone banking, online banking, and mobile banking options. Bank had seven deposit-taking ATMs in the AA, none of which were in low- or moderate-income geographies. Bank provided data indicated that during the evaluation period, customers in low- and moderate-income geographies maintained their usage of ATMs and digital banking. These systems provided additional availability and access to banking services to both retail and business customers and had a positive impact on the service delivery systems conclusion.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Full-Scope							
Cheyenne, WY MSA	2	0	0	0	2	0	0
Limited-Scope							
Non-MSA WY	1	0	0	0	0	1	0
The table presents the data for the entire rating area. The narrative addresses performance in full-scope areas only.							
* The NA category consists of geographies that have not been assigned an income classification.							

To the extent changes have been made, 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. During the evaluation period, the bank entered the AA and opened two branches, none of which were in low- or moderate-income geographies. The bank did not close branches in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. JPMCB offered traditional banking products and services at all branch locations in the AA. Business hours were 9:00 a.m. to 5:00 p.m., Monday through Friday, and from 9:00 a.m. to 1:00 p.m. on Saturday.

Community Development Services

The bank provided a relatively high level of CD services, consistent with its capacity and expertise to conduct specific activities in the Cheyenne, WY MSA.

Bank records show that employees provided their financial or job-specific expertise and/or technical assistance for total of 49 qualified CD service activities to 15 organizations, for a total of 57 hours. A majority of the bank's assistance was to organizations providing community services targeted to low- and moderate-income individuals and families. The bank's assistance was responsive to needs identified in the AA, particularly with credit counseling and first-time home buyers' education.

Service activities during the evaluation period include:

- JPMCB collaborated with a nonprofit organization whose mission was for low-income single mothers to build self-sufficiency through career training and job placement. JPMCB employees joined events to help participants with networking and interviewing skills, which impacted 30 low- and moderate-income individuals.

- JPMCB partnered with 14 CCAs to provide credit counseling and debt education to 41 low- or moderate-income individuals. JPMCB employees assisted in providing budget, housing, student loan, and bankruptcy counseling, debt management, and financial education.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in non-MSA Wyoming was consistent with the bank's performance in the full-scope area. Performance in the limited-scope AA supported the overall rating.

Appendix A: Scope of Examination

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

Time Period Reviewed:	January 1, 2020, to December 31, 2023	
Bank Products Reviewed:	Home mortgage, small business, small farm, CD loans, qualified investments, CD services	
Affiliate(s):	Affiliate Relationship	Products Reviewed
DNT Asset Trust	Subsidiary	CD Loans
Chase Community Equity, LLC	Affiliate	Qualified Investments
FNBC Leasing Corporation	Subsidiary	Qualified Investments
JPMorgan Chase Community Development Corporation	Subsidiary	Qualified Investments
Chase New Markets Corporation	Subsidiary	Qualified Investments
JPMorgan Chase Foundation	Affiliate	Qualified Investments

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSAs		
New York-Newark, NY-NJ-CT-PA CSA	Full-Scope	CT: Bridgeport-Stamford-Norwalk, CT MSA # 14860 (Fairfield) New Haven-Milford, CT MSA # 35300 (New Haven) NJ: New York-Newark-Jersey City, NY-NJ-PA MSA # 35620 (Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, Union) Trenton-Princeton, NJ MSA # 45940 (Mercer) NY: Kingston, NY MSA # 28740 (Ulster) New York-Newark-Jersey City, NY-NJ-PA MSA # 35620 (Bronx, Kings, Nassau, New York, Putnam, Queens, Richmond, Rockland, Suffolk, Westchester) Poughkeepsie-Newburgh-Middletown, NY MSA # 39100 (Dutchess, Orange)
Chicago-Naperville, IL-IN-WI CSA	Full-Scope	IL: Chicago-Naperville-Elgin, IL-IN-WI MSA # 16980 (Cook, Dekalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, Will) IN: Chicago-Naperville-Elgin, IL-IN-WI MSA # 16980 (Lake, Porter) Michigan City-La Porte, IN MSA # 33140 (Laporte) WI: Chicago-Naperville-Elgin, IL-IN-WI MSA # 16980 (Kenosha)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Portland-Vancouver-Salem, OR-WA CSA	Full-Scope	OR: Albany-Lebanon, OR MSA # 10540 (Linn) Corvallis, OR MSA # 18700 (Benton) Portland-Vancouver-Hillsboro, OR-WA MSA # 38900 (Clackamas, Columbia, Multnomah, Washington, Yamhill) Salem, OR MSA # 41420 (Marion, Polk) WA: Longview, WA MSA # 31020 (Cowlitz) Portland-Vancouver-Hillsboro, OR-WA MSA # 38900 (Clark)
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA	Full-Scope	IN: Louisville/Jefferson County, KY-IN MSA # 31140 (Clark, Floyd, Harrison) Scottsburg, IN MiSA # 42500 (Scott) KY: Elizabethtown-Fort Knox, KY MSA # 21060 (Hardin) Louisville/Jefferson County, KY-IN MSA # 31140 (Jefferson, Oldham, Shelby)
Cincinnati, OH-KY-IN MMSA	Full-Scope	KY: Cincinnati, OH-KY-IN MSA # 17140 (Boone, Campbell, Kenton) OH: Cincinnati, OH-KY-IN MSA # 17140 (Butler, Clermont, Hamilton, Warren)
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	Full-Scope	DC: Washington-Arlington-Alexandria, DC-VA-MD-WV MSA # 47900 (District Of Columbia) MD: Baltimore-Columbia-Towson, MD MSA # 12580 (Anne Arundel, Baltimore, Baltimore City, Carroll, Howard) California-Lexington Park, MD MSA # 15680 (St. Mary's) Washington-Arlington-Alexandria, DC-VA-MD-WV MSA # 47900 (Calvert, Frederick, Montgomery, Prince George's) VA: Washington-Arlington-Alexandria, DC-VA-MD-WV MSA # 47900 (Alexandria City, Arlington, Fairfax, Fairfax City, Falls Church City, Loudoun, Manassas City, Manassas Park City, Prince William, Stafford)
Boston-Worcester-Providence, MA-RI-NH-CT CSA	Full-Scope	MA: Boston-Cambridge-Newton, MA-NH MSA # 14460 (Essex, Middlesex, Norfolk, Plymouth, Suffolk) Providence-Warwick, RI-MA MSA # 39300 (Bristol) Worcester, MA-CT MSA # 49340 (Worcester) NH: Boston-Cambridge-Newton, MA-NH MSA # 14460 (Rockingham) Manchester-Nashua, NH MSA # 31700 (Hillsborough) RI: Providence-Warwick, RI-MA MSA # 39300 (Bristol, Kent, Newport, Providence, Washington)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MMSA	Full-Scope	DE: Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA # 37980 (New Castle) NJ: Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA # 37980 (Burlington, Camden, Gloucester) PA: Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA # 37980 (Bucks, Chester, Delaware, Montgomery, Philadelphia)
St. Louis, MO-IL MMSA	Full-Scope	IL: St. Louis, MO-IL MSA # 41180 (Madison, St. Clair) MO: St. Louis, MO-IL MSA # 41180 (Jefferson, St. Charles, St. Louis, St. Louis City)
Charlotte-Concord-Gastonia, NC-SC MMSA	Full-Scope	NC: Charlotte-Concord-Gastonia, NC-SC MSA # 16740 (Cabarrus, Gaston, Iredell, Mecklenburg, Union) SC: Charlotte-Concord-Gastonia, NC-SC MSA # 16740 (York)
Kansas City-Overland Park-Kansas City, MO-KS CSA	Full-Scope	KS: Kansas City, MO-KS MSA # 28140 (Johnson, Miami, Wyandotte) Ottawa, KS MiSA # 36840 (Franklin) MO: Kansas City, MO-KS MSA # 28140 (Cass, Clay, Jackson, Platte)
Wheeling, WV-OH MMSA	Full-Scope	OH: Wheeling, WV-OH MSA # 48540 (Belmont) WV: Wheeling, WV-OH MSA # 48540 (Marshall, Ohio)
Allentown-Bethlehem-Easton, PA-NJ MMSA	Full-Scope	NJ: Allentown-Bethlehem-Easton, PA-NJ MSA # 10900 (Warren) PA: Allentown-Bethlehem-Easton, PA-NJ MSA # 10900 (Lehigh, Northampton)
Omaha-Council Bluffs, NE-IA MMSA	Full-Scope	IA: Omaha-Council Bluffs, NE-IA MSA # 36540 (Pottawattamie) NE: Omaha-Council Bluffs, NE-IA MSA # 36540 (Douglas, Sarpy)
States		
Alabama		
Auburn-Opelika, AL MSA	Full-Scope	Auburn-Opelika, AL MSA # 12220 (Lee)
Birmingham-Hoover, AL MSA	Limited-Scope	Birmingham-Hoover, AL MSA # 13820 (Jefferson, Shelby)
Tuscaloosa, AL MSA	Limited-Scope	Tuscaloosa, AL MSA # 46220 (Tuscaloosa)
Arkansas		

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Little Rock-North Little Rock-Conway, AR MSA	Full-Scope	Little Rock-North Little Rock-Conway, AR MSA # 30780 (Pulaski)
Fayetteville-Springdale-Rogers, AR MSA	Limited-Scope	Fayetteville-Springdale-Rogers, AR MSA # 22220 (Benton, Washington)
Arizona		
Phoenix-Mesa, AZ CSA	Full-Scope	Phoenix-Mesa-Chandler, AZ MSA # 38060 (Maricopa, Pinal) Payson, AZ MiSA # 37740 (Gila)
Flagstaff, AZ MSA	Limited-Scope	Flagstaff, AZ MSA # 22380 (Coconino)
Lake Havasu City-Kingman, AZ MSA	Limited-Scope	Lake Havasu City-Kingman, AZ MSA # 29420 (Mohave)
Prescott Valley-Prescott, AZ MSA	Limited-Scope	Prescott Valley-Prescott, AZ MSA # 39150 (Yavapai)
Sierra Vista-Douglas, AZ MSA	Limited-Scope	Sierra Vista-Douglas, AZ MSA # 43420 (Cochise)
Tucson-Nogales, AZ CSA	Limited-Scope	Nogales, AZ MiSA # 35700 (Santa Cruz) Tucson, AZ MSA # 46060 (Pima)
Yuma, AZ MSA	Limited-Scope	Yuma, AZ MSA # 49740 (Yuma)
Non-MSA AZ	Limited-Scope	Includes: NM AZ - La Paz County, AZ (La Paz) Show Low, AZ MiSA # 43320 (Navajo) Safford, AZ MiSA # 40940 (Graham)
California		
Fresno-Madera-Hanford, CA CSA	Full-Scope	Fresno, CA MSA # 23420 (Fresno) Hanford-Corcoran, CA MSA # 25260 (Kings) Madera, CA MSA # 31460 (Madera)
Los Angeles-Long Beach, CA CSA	Full-Scope	Los Angeles-Long Beach-Anaheim, CA MSA # 31080 (Los Angeles, Orange) Oxnard-Thousand Oaks-Ventura, CA MSA # 37100 (Ventura) Riverside-San Bernardino-Ontario, CA MSA # 40140 (Riverside, San Bernardino)
San Jose-San Francisco-Oakland, CA CSA	Full-Scope	Merced, CA MSA # 32900 (Merced) Modesto, CA MSA # 33700 (Stanislaus) Napa, CA MSA # 34900 (Napa) San Francisco-Oakland-Berkeley, CA MSA # 41860 (Alameda, Contra Costa, Marin, San Francisco, San Mateo) San Jose-Sunnyvale-Santa Clara, CA MSA # 41940 (San Benito, Santa Clara) Santa Cruz-Watsonville, CA MSA # 42100 (Santa Cruz) Santa Rosa-Petaluma, CA MSA # 42220 (Sonoma) Stockton, CA MSA # 44700 (San Joaquin) Vallejo, CA MSA # 46700 (Solano)
Bakersfield, CA MSA	Limited-Scope	Bakersfield, CA MSA # 12540 (Kern)
Chico, CA MSA	Limited-Scope	Chico, CA MSA # 17020 (Butte)
El Centro, CA MSA	Limited-Scope	El Centro, CA MSA # 20940 (Imperial)
Redding-Red Bluff, CA CSA	Limited-Scope	Red Bluff, CA MiSA # 39780 (Tehama) Redding, CA MSA # 39820 (Shasta)
Sacramento-Roseville, CA CSA	Limited-Scope	Sacramento-Roseville-Folsom, CA MSA # 40900 (El Dorado, Placer, Sacramento, Yolo) Truckee-Grass Valley, CA MiSA # 46020 (Nevada) Yuba City, CA MSA # 49700 (Sutter, Yuba)
Salinas, CA MSA	Limited-Scope	Salinas, CA MSA # 41500 (Monterey)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
San Diego-Chula Vista-Carlsbad, CA MSA	Limited-Scope	San Diego-Chula Vista-Carlsbad, CA MSA # 41740 (San Diego)
San Luis Obispo-Paso Robles, CA MSA	Limited-Scope	San Luis Obispo-Paso Robles, CA MSA # 42020 (San Luis Obispo)
Santa Maria-Santa Barbara, CA MSA	Limited-Scope	Santa Maria-Santa Barbara, CA MSA # 42200 (Santa Barbara)
Visalia, CA MSA	Limited-Scope	Visalia, CA MSA # 47300 (Tulare)
Non-MSA CA	Limited-Scope	Includes: Crescent City, CA MiSA # 18860 (Del Norte) Clearlake, CA MiSA # 17340 (Lake) Eureka-Arcata, CA MiSA # 21700 (Humboldt) NM CA - Inyo County, CA (Inyo) NM CA - Siskiyou County, CA (Siskiyou) Ukiah, CA MiSA # 46380 (Mendocino)
Colorado		
Denver-Aurora, CO CSA	Full-Scope	Boulder, CO MSA # 14500 (Boulder) Denver-Aurora-Lakewood, CO MSA # 19740 (Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, Park) Greeley, CO MSA # 24540 (Weld)
Colorado Springs, CO MSA	Limited-Scope	Colorado Springs, CO MSA # 17820 (El Paso)
Fort Collins, CO MSA	Limited-Scope	Fort Collins, CO MSA # 22660 (Larimer)
Non-MSA CO	Limited-Scope	Includes: Edwards-Glenwood Springs, CO CSA # 233: Edwards, CO MiSA # 20780 (Eagle), Glenwood Springs, CO MiSA # 24060 (Garfield, Pitkin) NM CO - San Miguel County, CO (San Miguel)
Connecticut		
Hartford-East Hartford-Middletown, CT MSA	Full-Scope	Hartford-East Hartford-Middletown, CT MSA # 25540 (Hartford, Tolland)
Florida		
Miami-Port St. Lucie-Fort Lauderdale, FL CSA	Full-Scope	Miami-Fort Lauderdale-Pompano Beach, FL MSA # 33100 (Broward, Miami-Dade, Palm Beach) Port St. Lucie, FL MSA # 38940 (Martin, St. Lucie) Sebastian-Vero Beach, FL MSA # 42680 (Indian River)
Tampa-St. Petersburg-Clearwater, FL MSA	Full-Scope	Tampa-St. Petersburg-Clearwater, FL MSA # 45300 (Hernando, Hillsborough, Pasco, Pinellas)
Cape Coral-Fort Myers-Naples, FL CSA	Limited-Scope	Cape Coral-Fort Myers, FL MSA # 15980 (Lee) Naples-Marco Island, FL MSA # 34940 (Collier)
Gainesville, FL MSA	Limited-Scope	Gainesville, FL MSA # 23540 (Alachua)
Jacksonville, FL MSA	Limited-Scope	Jacksonville, FL MSA # 27260 (Clay, Duval, Nassau, St. Johns)
North Port-Sarasota, FL CSA	Limited-Scope	North Port-Sarasota-Bradenton, FL MSA # 35840 (Manatee, Sarasota) Punta Gorda, FL MSA # 39460 (Charlotte)
Ocala, FL MSA	Limited-Scope	Ocala, FL MSA # 36100 (Marion)
Orlando-Lakeland-Deltona, FL CSA	Limited-Scope	Deltona-Daytona Beach-Ormond Beach, FL MSA # 19660 (Flagler, Volusia) Lakeland-Winter Haven, FL MSA # 29460 (Polk) Orlando-Kissimmee-Sanford, FL MSA # 36740 (Lake, Orange, Osceola, Seminole) The Villages, FL MSA # 45540 (Sumter)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Palm Bay-Melbourne-Titusville, FL MSA	Limited-Scope	Palm Bay-Melbourne-Titusville, FL MSA # 37340 (Brevard)
Tallahassee, FL MSA	Limited-Scope	Tallahassee, FL MSA # 45220 (Leon)
Georgia		
Atlanta--Athens-Clarke County--Sandy Springs, GA-AL CSA	Full-Scope	Athens-Clarke County, GA MSA # 12020 (Clarke, Oconee) Atlanta-Sandy Springs-Alpharetta, GA MSA # 12060 (Barrow, Cherokee, Clayton, Cobb, Coweta, Dekalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Paulding, Rockdale, Walton) Gainesville, GA MSA # 23580 (Hall) Jefferson, GA MiSA # 27600 (Jackson)
Savannah, GA MSA	Limited-Scope	Savannah, GA MSA # 42340 (Chatham)
Idaho		
Boise City, ID MSA	Full-Scope	Boise City, ID MSA # 14260 (Ada, Canyon, Owyhee)
Coeur d'Alene, ID MSA	Limited-Scope	Coeur d'Alene, ID MSA # 17660 (Kootenai)
Idaho Falls, ID MSA	Limited-Scope	Idaho Falls, ID MSA # 26820 (Bonneville)
Pocatello, ID MSA	Limited-Scope	Pocatello, ID MSA # 38540 (Bannock)
Twin Falls, ID MSA	Limited-Scope	Twin Falls, ID MSA # 46300 (Twin Falls)
Non-MSA ID	Limited-Scope	Includes: Moscow, ID MiSA # 34140 (Latah) Mountain Home, ID MiSA # 34300 (Elmore)
Illinois		
Rockford, IL MSA	Full-Scope	Rockford, IL MSA # 40420 (Boone, Winnebago)
Bloomington, IL MSA	Limited-Scope	Bloomington, IL MSA # 14010 (McLean)
Champaign-Urbana, IL MSA	Limited-Scope	Champaign-Urbana, IL MSA # 16580 (Champaign, Piatt)
Davenport-Moline-Rock Island, IA-IL MSA	Limited-Scope	Davenport-Moline-Rock Island, IA-IL MSA # 19340 (Henry, Rock Island)
Peoria, IL MSA	Limited-Scope	Peoria, IL MSA # 37900 (Peoria, Tazewell)
Springfield, IL MSA	Limited-Scope	Springfield, IL MSA # 44100 (Menard, Sangamon)
Indiana		
Indianapolis-Carmel-Muncie, IN CSA	Full-Scope	Crawfordsville, IN MiSA # 18820 (Montgomery) Indianapolis-Carmel-Anderson, IN MSA # 26900 (Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby) Muncie, IN MSA # 34620 (Delaware) New Castle, IN MiSA # 35220 (Henry)
Bloomington-Bedford, IN CSA	Limited-Scope	Bedford, IN MiSA # 13260 (Lawrence) Bloomington, IN MSA # 14020 (Monroe)
Elkhart-Goshen, IN MSA	Limited-Scope	Elkhart-Goshen, IN MSA # 21140 (Elkhart)
Fort Wayne-Huntington-Auburn, IN CSA	Limited-Scope	Fort Wayne, IN MSA # 23060 (Allen, Whitley) Kendallville, IN MiSA # 28340 (Noble)
Lafayette-West Lafayette, IN MSA	Limited-Scope	Lafayette-West Lafayette, IN MSA # 29200 (Tippecanoe)
South Bend-Mishawaka, IN-MI MSA	Limited-Scope	South Bend-Mishawaka, IN-MI MSA # 43780 (St. Joseph)
Non-MSA IN	Limited-Scope	Includes: Richmond-Connersville, IN CSA # 458: Richmond, IN MiSA # 39980 (Wayne)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Iowa		
Des Moines-West Des Moines, IA MSA	Full-Scope	Des Moines-West Des Moines, IA MSA # 19780 (Dallas, Polk)
Cedar Rapids-Iowa City, IA CSA	Limited-Scope	Cedar Rapids, IA MSA # 16300 (Linn) Iowa City, IA MSA # 26980 (Johnson)
Kansas		
Manhattan, KS MSA	Full-Scope	Manhattan, KS MSA # 31740 (Geary, Pottawatomie, Riley)
Kentucky		
Lexington-Fayette--Richmond--Frankfort, KY CSA	Full-Scope	Lexington-Fayette, KY MSA # 30460 (Fayette, Jessamine) Richmond-Berea, KY MiSA # 40080 (Madison)
Bowling Green, KY MSA	Limited-Scope	Bowling Green, KY MSA # 14540 (Warren)
Owensboro, KY MSA	Limited-Scope	Owensboro, KY MSA # 36980 (Davies)
Non-MSA KY	Limited-Scope	Includes: Danville, KY MiSA # 19220 (Boyle)
Louisiana		
New Orleans-Metairie-Hammond, LA-MS CSA	Full-Scope	Hammond, LA MSA # 25220 (Tangipahoa Parish) New Orleans-Metairie, LA MSA # 35380 (Jefferson Parish, Orleans Parish, St. Bernard Parish, St. Charles Parish, St. John The Baptist Parish, St. Tammany Parish)
Alexandria, LA MSA	Limited-Scope	Alexandria, LA MSA # 10780 (Rapides Parish)
Baton Rouge, LA MSA	Limited-Scope	Baton Rouge, LA MSA # 12940 (Ascension Parish, East Baton Rouge Parish, Livingston Parish)
Houma-Thibodaux, LA MSA	Limited-Scope	Houma-Thibodaux, LA MSA # 26380 (Lafourche Parish, Terrebonne Parish)
Lafayette-Opelousas-Morgan City, LA CSA	Limited-Scope	Lafayette, LA MSA # 29180 (Acadia Parish, Iberia Parish, Lafayette Parish, St. Martin Parish, Vermilion Parish) Opelousas, LA MiSA # 36660 (St. Landry Parish)
Lake Charles, LA MSA	Limited-Scope	Lake Charles, LA MSA # 29340 (Calcasieu Parish)
Monroe-Ruston, LA CSA	Limited-Scope	Monroe, LA MSA # 33740 (Ouachita Parish) Ruston, LA MiSA # 40820 (Lincoln Parish)
Shreveport-Bossier City, LA MSA	Limited-Scope	Shreveport-Bossier City, LA MSA # 43340 (Bossier Parish, Caddo Parish)
Non-MSA LA	Limited-Scope	Includes: DeRidder-Fort Polk South, LA CSA # 217: DeRidder, LA MiSA # 19760 (Beauregard Parish) Fort Polk South, LA MiSA # 22860 (Vernon Parish)
Maine		
Portland-Lewiston-South Portland, ME CSA	Full-Scope	Portland-South Portland, ME MSA # 38860 (Cumberland, York)
Massachusetts		
Springfield, MA MSA	Full-Scope	Springfield, MA MSA # 44140 (Hampden, Hampshire)
Pittsfield, MA MSA	Limited-Scope	Pittsfield, MA MSA # 38340 (Berkshire)
Non-MSA MA	Limited-Scope	Includes: Vineyard Haven, MA MiSA # 47240 (Dukes)
Michigan		
Detroit-Warren-Ann Arbor, MI CSA	Full-Scope	Ann Arbor, MI MSA # 11460 (Washtenaw) Detroit-Warren-Dearborn, MI MSA # 19820 (Lapeer, Livingston,

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Rating and Assessment Areas	Type of Exam	Other Information
		Macomb, Oakland, St. Clair, Wayne) Flint, MI MSA # 22420 (Genesee)
Grand Rapids-Kentwood-Muskegon, MI CSA	Limited-Scope	Grand Rapids-Kentwood, MI MSA # 24340 (Kent, Montcalm, Ottawa) Muskegon, MI MSA # 34740 (Muskegon)
Kalamazoo-Portage, MI MSA	Limited-Scope	Kalamazoo-Portage, MI MSA # 28020 (Kalamazoo)
Lansing-East Lansing, MI MSA	Limited-Scope	Lansing-East Lansing, MI MSA # 29620 (Clinton, Eaton, Ingham, Shiawassee)
Niles, MI MSA	Limited-Scope	Niles, MI MSA # 35660 (Berrien)
Saginaw, MI MSA	Limited-Scope	Saginaw, MI MSA # 40980 (Saginaw)
Non-MSA MI	Limited-Scope	Includes: NM MI - Petoskey, MI (Charlevoix, Emmet) NM MI - Roscommon County, MI (Roscommon) NM MI - Sanilac, MI (Sanilac) Traverse City, MI MiSA # 45900 (Grand Traverse, Kalkaska)
Minnesota		
Minneapolis-St. Paul, MN-WI CSA	Full-Scope	Minneapolis-St. Paul-Bloomington, MN-WI MSA # 33460 (Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, Sherburne, Washington) St. Cloud, MN MSA # 41060 (Benton, Stearns)
Mississippi		
Jackson, MS MSA	Full-Scope	Jackson, MS MSA # 27140 (Hinds, Madison, Rankin)
Montana		
Billings, MT MSA	Full-Scope	Billings, MT MSA # 13740 (Yellowstone)
Non-MSA MT	Limited-Scope	Includes: Bozeman, MT MiSA # 14580 (Gallatin) Helena, MT MiSA # 25740 (Lewis and Clark)
Nebraska		
Lincoln-Beatrice, NE CSA	Full-Scope	Lincoln, NE MSA # 30700 (Lancaster)
New Mexico		
Albuquerque, NM MSA	Full-Scope	Albuquerque, NM MSA # 10740 (Bernalillo)
Nevada		
Las Vegas-Henderson-Paradise, NV MSA	Full-Scope	Las Vegas-Henderson-Paradise, NV MSA # 29820 (Clark)
Reno-Carson City-Fernley, NV CSA	Limited-Scope	Carson City, NV MSA # 16180 (Carson City) Gardnerville Ranchos, NV MiSA # 23820 (Douglas) Reno, NV MSA # 39900 (Washoe)
New York		
Rochester, NY MSA	Full-Scope	Rochester, NY MSA # 40380 (Monroe, Ontario, Wayne)
Syracuse, NY MSA	Full-Scope	Syracuse, NY MSA # 45060 (Madison, Onondaga, Oswego)
Albany-Schenectady-Troy, NY MSA	Limited-Scope	Albany-Schenectady-Troy, NY MSA # 10580 (Albany, Rensselaer, Saratoga, Schenectady)
Binghamton, NY MSA	Limited-Scope	Binghamton, NY MSA # 13780 (Broome)
Buffalo-Cheektowaga, NY MSA	Limited-Scope	Buffalo-Cheektowaga, NY MSA # 15380 (Erie)
Ithaca, NY MSA	Limited-Scope	Ithaca, NY MSA # 27060 (Tompkins)
Non-MSA NY	Limited-Scope	Includes: NM NY - Sullivan County, NY (Sullivan)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
North Carolina		
Raleigh-Durham-Cary, NC CSA	Full-Scope	Durham-Chapel Hill, NC MSA # 20500 (Chatham, Durham, Orange) Raleigh-Cary, NC MSA # 39580 (Wake)
Greenville, NC MSA	Limited-Scope	Greenville, NC MSA # 24780 (Pitt)
North Dakota		
Fargo, ND-MN MSA	Full-Scope	Fargo, ND-MN MSA # 22020 (Cass)
Ohio		
Columbus-Marion-Zanesville, OH CSA	Full-Scope	Columbus, OH MSA # 18140 (Delaware, Fairfield, Franklin, Hocking, Licking, Madison, Morrow, Perry, Pickaway, Union) Marion, OH MSA # 32020 (Marion) Zanesville, OH MSA # 49780 (Muskingum)
Cleveland-Akron-Canton, OH CSA	Limited-Scope	Akron, OH MSA # 10420 (Portage, Summit) Canton-Massillon, OH MSA # 15940 (Stark) Cleveland-Elyria, OH MSA # 17460 (Cuyahoga, Geauga, Lake, Lorain, Medina) New Philadelphia-Dover, OH MSA # 35420 (Tuscarawas) Wooster, OH MSA # 49300 (Wayne)
Dayton-Springfield-Kettering, OH CSA	Limited-Scope	Dayton-Kettering, OH MSA # 19430 (Greene, Miami, Montgomery) Greenville, OH MSA # 24820 (Darke) Sidney, OH MSA # 43380 (Shelby) Springfield, OH MSA # 44220 (Clark)
Lima-Van Wert-Celina, OH CSA	Limited-Scope	Celina, OH MSA # 16380 (Mercer) Lima, OH MSA # 30620 (Allen) Wapakoneta, OH MSA # 47540 (Auglaize)
Mansfield-Ashland-Bucyrus, OH CSA	Limited-Scope	Ashland, OH MSA # 11740 (Ashland) Mansfield, OH MSA # 31900 (Richland)
Toledo-Findlay-Tiffin, OH CSA	Limited-Scope	Findlay, OH MSA # 22300 (Hancock) Toledo, OH MSA # 45780 (Lucas, Wood)
Weirton-Steubenville, WV-OH MSA	Limited-Scope	Weirton-Steubenville, WV-OH MSA # 48260 (Jefferson)
Youngstown-Warren, OH-PA CSA	Limited-Scope	Salem, OH MSA # 41400 (Columbiana) Youngstown-Warren-Boardman, OH-PA MSA # 49660 (Mahoning, Trumbull)
Non-MSA OH	Limited-Scope	Includes: Athens, OH MSA # 11900 (Athens) Coshocton, OH MSA # 18740 (Coshocton) NM OH - Wyandot County, OH (Wyandot) Parkersburg-Marietta-Vienna, WV-OH CSA # 425: Marietta, OH MSA # 31930 (Washington)
Oklahoma		
Oklahoma City, OK MSA	Full-Scope	Oklahoma City, OK MSA # 36420 (Canadian, Cleveland, Oklahoma)
Tulsa, OK MSA	Limited-Scope	Tulsa, OK MSA # 46140 (Tulsa)
Non-MSA OK	Limited-Scope	Includes: Stillwater, OK MiSA # 44660 (Payne)
Oregon		
Medford-Grants Pass, OR CSA	Full-Scope	Medford, OR MSA # 32780 (Jackson) Grants Pass, OR MSA # 24420 (Josephine)
Bend-Prineville, OR CSA	Limited-Scope	Prineville, OR MiSA # 39260 (Crook) Bend, OR MSA # 13460 (Deschutes)
Eugene-Springfield, OR MSA	Limited-Scope	Eugene-Springfield, OR MSA # 21660 (Lane)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Non-MSA OR	Limited-Scope	Includes: Klamath Falls, OR MiSA # 28900 (Klamath) Brookings, OR MiSA # 15060 (Curry) Roseburg, OR MiSA # 40700 (Douglas) Ontario, OR-ID MiSA # 36620 (Malheur) Coos Bay, OR MiSA # 18300 (Coos) Newport, OR MiSA # 35440 (Lincoln)
Pennsylvania		
Pittsburgh, PA MSA	Full-Scope	Pittsburgh, PA MSA # 38300 (Allegheny, Butler, Washington, Westmoreland)
Scranton--Wilkes-Barre, PA MSA	Limited-Scope	Scranton--Wilkes-Barre, PA MSA # 42540 (Lackawanna, Luzerne)
South Carolina		
Charleston-North Charleston, SC MSA	Full-Scope	Charleston-North Charleston, SC MSA # 16700 (Berkeley, Charleston, Dorchester)
Greenville-Anderson, SC MSA	Limited-Scope	Greenville-Anderson, SC MSA # 24860 (Anderson, Greenville, Pickens)
South Dakota		
Sioux Falls, SD MSA	Full-Scope	Sioux Falls, SD MSA # 43620 (Lincoln, Minnehaha)
Tennessee		
Nashville-Davidson--Murfreesboro--Franklin, TN MSA	Full-Scope	Nashville-Davidson--Murfreesboro--Franklin, TN MSA # 34980 (Davidson, Maury, Rutherford, Sumner, Williamson, Wilson)
Texas		
Dallas-Fort Worth, TX-OK CSA	Full-Scope	Corsicana, TX MiSA # 18620 (Navarro) Dallas-Fort Worth-Arlington, TX MSA # 19100 (Collin, Dallas, Denton, Ellis, Hunt, Johnson, Kaufman, Parker, Rockwall, Tarrant) Granbury, TX MiSA # 24180 (Hood) Sherman-Denison, TX MSA # 43300 (Grayson)
Houston-The Woodlands, TX CSA	Full-Scope	Brenham, TX MiSA # 14780 (Washington) Houston-The Woodlands-Sugar Land, TX MSA # 26420 (Austin, Brazoria, Fort Bend, Galveston, Harris, Montgomery, Waller)
Abilene, TX MSA	Limited-Scope	Abilene, TX MSA # 10180 (Taylor)
Amarillo, TX MSA	Limited-Scope	Amarillo, TX MSA # 11100 (Potter, Randall)
Austin-Round Rock-Georgetown, TX MSA	Limited-Scope	Austin-Round Rock-Georgetown, TX MSA # 12420 (Bastrop, Caldwell, Hays, Travis, Williamson)
Beaumont-Port Arthur, TX MSA	Limited-Scope	Beaumont-Port Arthur, TX MSA # 13140 (Jefferson, Orange)
Brownsville-Harlingen, TX MSA	Limited-Scope	Brownsville-Harlingen, TX MSA # 15180 (Cameron)
College Station-Bryan, TX MSA	Limited-Scope	College Station-Bryan, TX MSA # 17780 (Brazos)
El Paso, TX MSA	Limited-Scope	El Paso, TX MSA # 21340 (El Paso)
Killeen-Temple, TX MSA	Limited-Scope	Killeen-Temple, TX MSA # 28660 (Bell)
Laredo, TX MSA	Limited-Scope	Laredo, TX MSA # 29700 (Webb)
Longview, TX MSA	Limited-Scope	Longview, TX MSA # 30980 (Gregg, Harrison)
Lubbock, TX MSA	Limited-Scope	Lubbock, TX MSA # 31180 (Lubbock)
McAllen-Edinburg-Mission, TX MSA	Limited-Scope	McAllen-Edinburg-Mission, TX MSA # 32580 (Hidalgo)

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Rating and Assessment Areas	Type of Exam	Other Information
Midland-Odessa, TX CSA	Limited-Scope	Midland, TX MSA # 33260 (Midland) Odessa, TX MSA # 36220 (Ector)
San Antonio-New Braunfels, TX MSA	Limited-Scope	San Antonio-New Braunfels, TX MSA # 41700 (Bexar, Comal, Guadalupe)
Tyler, TX MSA	Limited-Scope	Tyler, TX MSA # 46340 (Smith)
Waco, TX MSA	Limited-Scope	Waco, TX MSA # 47380 (McLennan)
Wichita Falls, TX MSA	Limited-Scope	Wichita Falls, TX MSA # 48660 (Whichita)
Non-MSA TX	Limited-Scope	Includes: Kerrville-Fredericksburg, TX CSA # 314: Fredericksburg, TX MiSA # 23240 (Gillespie) Kerrville, TX MiSA # 28500 (Kerr)
Utah		
Salt Lake City-Provo-Orem, UT CSA	Full-Scope	Heber, UT MiSA # 25720 (Summit, Wasatch) Ogden-Clearfield, UT MSA # 36260 (Davis, Weber) Provo-Orem, UT MSA # 39340 (Utah) Salt Lake City, UT MSA # 41620 (Salt Lake)
Logan, UT-ID MSA	Limited-Scope	Logan, UT-ID MSA # 30860 (Cache)
St. George, UT MSA	Limited-Scope	St. George, UT MSA # 41100 (Washington)
Virginia		
Richmond, VA MSA	Full-Scope	Richmond, VA MSA # 40060 (Chesterfield, Hanover, Henrico, Richmond City)
Charlottesville, VA MSA	Limited-Scope	Charlottesville, VA MSA # 16820 (Albemarle, Charlottesville City)
Virginia Beach-Norfolk-Newport News, VA-NC MSA	Limited-Scope	Virginia Beach-Norfolk-Newport News, VA-NC MSA # 47260 (James City, Newport News City, Norfolk City, Virginia Beach City, Williamsburg City)
Vermont		
Burlington-South Burlington, VT MSA	Full-Scope	Burlington-South Burlington, VT MSA # 15540 (Chittenden)
Washington		
Seattle-Tacoma, WA CSA	Full-Scope	Bremerton-Silverdale-Port Orchard, WA MSA # 14740 (Kitsap) Centralia, WA MiSA # 16500 (Lewis) Mount Vernon-Anacortes, WA MSA # 34580 (Skagit) Oak Harbor, WA MiSA # 36020 (Island) Olympia-Lacey-Tumwater, WA MSA # 36500 (Thurston) Seattle-Tacoma-Bellevue, WA MSA # 42660 (King, Pierce, Snohomish) Shelton, WA MiSA # 43220 (Mason)
Bellingham, WA MSA	Limited-Scope	Bellingham, WA MSA # 13380 (Whatcom)
Kennewick-Richland-Walla Walla, WA CSA	Limited-Scope	Kennewick-Richland, WA MSA # 28420 (Benton, Franklin) Walla Walla, WA MSA # 47460 (Walla Walla)
Spokane-Spokane Valley, WA MSA	Limited-Scope	Spokane-Spokane Valley, WA MSA # 44060 (Spokane, Stevens)
Wenatchee, WA MSA	Limited-Scope	Wenatchee, WA MSA # 48300 (Chelan, Douglas)
Yakima, WA MSA	Limited-Scope	Yakima, WA MSA # 49420 (Yakima)
Non-MSA WA	Limited-Scope	Includes: Aberdeen, WA MiSA # 10140 (Grays Harbor) Ellensburg, WA MiSA # 21260 (Kittitas) Moses Lake-Othello, WA CSA # 393: Moses Lake, WA MiSA # 34180 (Grant) NM WA - Jefferson County, WA (Jefferson) NM WA - Okanogan County, WA (Okanogan)

List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
		Port Angeles, WA MiSA # 38820 (Clallam) Pullman, WA MiSA # 39420 (Whitman)
West Virginia		
Charleston-Huntington-Ashland, WV-OH-KY CSA	Full-Scope	Charleston, WV MSA # 16620 (Boone, Clay, Jackson, Kanawha, Lincoln) Huntington-Ashland, WV-KY-OH MSA # 26580 (Cabell, Putnam, Wayne) Mount Gay-Shamrock, WV MiSA # 34350 (Logan)
Beckley, WV MSA	Limited-Scope	Beckley, WV MSA # 13220 (Fayette, Raleigh)
Morgantown, WV MSA	Limited-Scope	Morgantown, WV MSA # 34060 (Monongalia)
Non-MSA WV	Limited-Scope	Includes: Clarksburg, WV MiSA # 17220 (Harrison, Taylor) NM WV - Upshur County, WV (Upshur)
Wisconsin		
Milwaukee-Racine-Waukesha, WI CSA	Full-Scope	Beaver Dam, WI MiSA # 13180 (Dodge) Milwaukee-Waukesha, WI MSA # 33340 (Milwaukee, Ozaukee, Washington, Waukesha) Racine, WI MSA # 39540 (Racine) Whitewater, WI MiSA # 48580 (Walworth)
Appleton-Oshkosh-Neenah, WI CSA	Limited-Scope	Appleton, WI MSA # 11540 (Calumet, Outagamie) Oshkosh-Neenah, WI MSA # 36780 (Winnebago)
Fond du Lac, WI MSA	Limited-Scope	Fond du Lac, WI MSA # 22540 (Fond Du Lac)
Green Bay, WI MSA	Limited-Scope	Green Bay, WI MSA # 24580 (Brown)
Madison-Janesville-Beloit, WI CSA	Limited-Scope	Janesville-Beloit, WI MSA # 27500 (Rock) Madison, WI MSA # 31540 (Dane)
Wausau-Stevens Point-Wisconsin Rapids, WI CSA	Limited-Scope	Stevens Point, WI MiSA # 44620 (Portage) Wausau-Weston, WI MSA # 48140 (Marathon)
Non-MSA WI	Limited-Scope	Includes: NM WI - Langlade County, WI (Langlade)
Wyoming		
Cheyenne, WY MSA	Full-Scope	Cheyenne, WY MSA # 16940 (Laramie)
Non-MSA WY	Limited-Scope	Includes: Jackson, WY-ID MiSA # 27220 (Teton)

Appendix B: Summary of CSA/MMSA and State Ratings

RATINGS: JPMorgan Chase Bank, N.A.				
	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
JPMorgan Chase Bank, N.A.	Outstanding	Outstanding	Outstanding	Outstanding
CSA/MMSA or State				
New York-Newark, NY-NJ-CT-PA CSA	Outstanding	Outstanding	Outstanding	Outstanding
Chicago-Naperville, IL-IN-WI CSA	Outstanding	Outstanding	Outstanding	Outstanding
Portland-Vancouver-Salem, OR-WA CSA	Outstanding	Outstanding	Outstanding	Outstanding
Louisville/Jefferson County--Elizabethtown--Bardstown, KY-IN CSA	Outstanding	Outstanding	Outstanding	Outstanding
Cincinnati, OH-KY-IN MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA CSA	Outstanding	Outstanding	Outstanding	Outstanding
Boston-Worcester-Providence, MA-RI-NH-CT CSA	Outstanding	Outstanding	Outstanding	Outstanding
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MMSA	Outstanding	Outstanding	Outstanding	Outstanding
St. Louis, MO-IL MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Charlotte-Concord-Gastonia, NC-SC MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Kansas City-Overland Park-Kansas City, MO-KS CSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Wheeling, WV-OH MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Allentown-Bethlehem-Easton, PA-NJ MMSA	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Omaha-Council Bluffs, NE-IA MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Alabama	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Arizona	Outstanding	Outstanding	Outstanding	Outstanding
Arkansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
California	Outstanding	Outstanding	Outstanding	Outstanding
Colorado	Outstanding	Outstanding	Outstanding	Outstanding
Connecticut	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Georgia	Outstanding	Outstanding	Outstanding	Outstanding
Idaho	Outstanding	Outstanding	High Satisfactory	Outstanding
Illinois	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Indiana	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Iowa	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding

Kentucky	Outstanding	Outstanding	High Satisfactory	Outstanding
Louisiana	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Maine	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Michigan	Outstanding	High Satisfactory	Outstanding	Outstanding
Minnesota	Outstanding	Outstanding	Outstanding	Outstanding
Mississippi	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Montana	High Satisfactory	Outstanding	Outstanding	Outstanding
Nebraska	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Nevada	Outstanding	Low Satisfactory	Outstanding	Outstanding
New Mexico	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
North Dakota	High Satisfactory	Outstanding	Outstanding	Outstanding
Ohio	High Satisfactory	Outstanding	Outstanding	Outstanding
Oklahoma	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oregon	Outstanding	High Satisfactory	Outstanding	Outstanding
Pennsylvania	High Satisfactory	Outstanding	Outstanding	Outstanding
South Carolina	Outstanding	Outstanding	High Satisfactory	Outstanding
South Dakota	High Satisfactory	Outstanding	Outstanding	Outstanding
Tennessee	Outstanding	Outstanding	Outstanding	Outstanding
Texas	Outstanding	Outstanding	Outstanding	Outstanding
Utah	Outstanding	Low Satisfactory	Outstanding	Outstanding
Vermont	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Virginia	Outstanding	Outstanding	Outstanding	Outstanding
Washington	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	High Satisfactory	Outstanding	Outstanding	Outstanding
Wisconsin	High Satisfactory	Outstanding	Outstanding	Outstanding
Wyoming	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: 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/AA.

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.

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 Examiners to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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 (MD): 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 (MSA): 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.

Multistate Metropolitan Statistical Area (MMSA): 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 rating 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/AA. 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/AA. 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 AA.

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 AA.

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 \$500,000) 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
New York CSA	86,534	49,836,217	100.0	776,759	3.2	2.2	3.7	13.6	11.6	13.3	37.5	31.1	36.0	45.7	55.0	46.9	0.1	0.1	0.1
Total	86,534	49,836,217	100.0	776,759	3.2	2.2	3.7	13.6	11.6	13.3	37.5	31.1	36.0	45.7	55.0	46.9	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
New York CSA	36,813	25,463,235	100.0	434,762	3.2	3.6	4.2	14.5	15.4	15.4	38.4	34.6	37.3	43.5	45.9	42.7	0.4	0.5	0.4	
Total	36,813	25,463,235	100.0	434,762	3.2	3.6	4.2	14.5	15.4	15.4	38.4	34.6	37.3	43.5	45.9	42.7	0.4	0.5	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
New York CSA	86,534	49,836,217	100.0	776,759	24.9	3.0	3.8	15.6	13.8	14.1	17.4	19.8	21.3	42.1	53.6	46.8	0.0	9.8	14.0	
Total	86,534	49,836,217	100.0	776,759	24.9	3.0	3.8	15.6	13.8	14.1	17.4	19.8	21.3	42.1	53.6	46.8	0.0	9.8	14.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
New York CSA	36,813	25,463,235	100.0	434,762	24.3	5.4	5.3	15.9	18.6	16.1	18.1	21.2	21.3	41.8	43.3	42.8	0.0	11.6	14.4
Total	36,813	25,463,235	100.0	434,762	24.3	5.4	5.3	15.9	18.6	16.1	18.1	21.2	21.3	41.8	43.3	42.8	0.0	11.6	14.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
New York CSA	316,532	11,804,519	100.0	917,863	7.9	6.2	7.3	17.1	15.4	16.8	30.3	28.8	30.9	43.7	48.7	44.0	1.0	0.9	1.0
Total	316,532	11,804,519	100.0	917,863	7.9	6.2	7.3	17.1	15.4	16.8	30.3	28.8	30.9	43.7	48.7	44.0	1.0	0.9	1.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
New York CSA	431,098	7,338,747	100.0	836,836	8.5	8.6	7.6	17.4	17.1	17.1	30.7	30.5	31.8	41.3	42.2	41.5	2.1	1.6	2.0
Total	431,098	7,338,747	100.0	836,836	8.5	8.6	7.6	17.4	17.1	17.1	30.7	30.5	31.8	41.3	42.2	41.5	2.1	1.6	2.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
New York CSA	316,532	11,804,519	100.0	917,863	90.9	54.5	39.4	3.5	15.5	5.5	30.0
Total	316,532	11,804,519	100.0	917,863	90.9	54.5	39.4	3.5	15.5	5.5	30.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
New York CSA	431,098	7,338,747	100.0	836,836	93.2	75.9	50.0	2.6	15.0	4.3	9.1
Total	431,098	7,338,747	100.0	836,836	93.2	75.9	50.0	2.6	15.0	4.3	9.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
New York CSA	896	15,022	100.0	1,365	4.9	1.7	1.5	15.1	8.5	9.1	34.5	33.6	34.7	45.3	55.8	54.7	0.2	0.4	0.1
Total	896	15,022	100.0	1,365	4.9	1.7	1.5	15.1	8.5	9.1	34.5	33.6	34.7	45.3	55.8	54.7	0.2	0.4	0.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
New York CSA	1,511	17,819	100.0	1,378	5.5	4.5	3.6	15.8	11.5	9.7	35.4	34.0	36.5	42.5	49.1	49.7	0.8	0.9	0.5	
Total	1,511	17,819	100.0	1,378	5.5	4.5	3.6	15.8	11.5	9.7	35.4	34.0	36.5	42.5	49.1	49.7	0.8	0.9	0.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
New York CSA	896	15,022	100.0	1,365	97.1	69.0	61.5	1.8	9.8	1.1	21.2
Total	896	15,022	100.0	1,365	97.1	69.0	61.5	1.8	9.8	1.1	21.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
New York CSA	1,511	17,819	100.0	1,378	97.5	72.9	64.9	1.4	11.8	1.1	15.3
Total	1,511	17,819	100.0	1,378	97.5	72.9	64.9	1.4	11.8	1.1	15.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Chicago CSA	76,559	25,456,526	100.0	519,358	4.4	2.0	3.0	17.7	13.2	13.4	35.8	27.3	34.2	41.9	57.3	49.2	0.1	0.1	0.1	
Total	76,559	25,456,526	100.0	519,358	4.4	2.0	3.0	17.7	13.2	13.4	35.8	27.3	34.2	41.9	57.3	49.2	0.1	0.1	0.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Chicago CSA	21,771	8,316,514	100.0	256,361	4.5	3.6	4.1	18.2	17.7	16.5	38.2	34.0	38.1	38.8	44.3	41.0	0.3	0.3	0.3	
Total	21,771	8,316,514	100.0	256,361	4.5	3.6	4.1	18.2	17.7	16.5	38.2	34.0	38.1	38.8	44.3	41.0	0.3	0.3	0.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Chicago CSA	76,559	25,456,526	100.0	519,358	23.4	5.3	6.5	16.4	18.1	16.5	18.8	20.1	21.1	41.4	50.3	39.5	0.0	6.2	16.4	
Total	76,559	25,456,526	100.0	519,358	23.4	5.3	6.5	16.4	18.1	16.5	18.8	20.1	21.1	41.4	50.3	39.5	0.0	6.2	16.4	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Chicago CSA	21,771	8,316,514	100.0	256,361	22.9	13.1	10.1	16.8	26.1	21.4	19.4	19.4	21.0	40.9	33.4	30.7	0.0	8.1	16.7
Total	21,771	8,316,514	100.0	256,361	22.9	13.1	10.1	16.8	26.1	21.4	19.4	19.4	21.0	40.9	33.4	30.7	0.0	8.1	16.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Chicago CSA	113,100	3,084,740	100.0	318,791	6.1	3.0	6.9	16.9	13.4	18.7	29.6	29.3	31.0	47.0	54.0	43.1	0.4	0.3	0.3
Total	113,100	3,084,740	100.0	318,791	6.1	3.0	6.9	16.9	13.4	18.7	29.6	29.3	31.0	47.0	54.0	43.1	0.4	0.3	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Chicago CSA	152,077	2,183,137	100.0	273,669	6.0	3.0	4.7	17.1	13.0	16.3	32.4	33.2	35.0	43.9	50.4	43.6	0.6	0.4	0.4
Total	152,077	2,183,137	100.0	273,669	6.0	3.0	4.7	17.1	13.0	16.3	32.4	33.2	35.0	43.9	50.4	43.6	0.6	0.4	0.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Chicago CSA	113,100	3,084,740	100.0	318,791	86.8	58.9	43.5	4.9	13.6	8.3	27.5
Total	113,100	3,084,740	100.0	318,791	86.8	58.9	43.5	4.9	13.6	8.3	27.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Chicago CSA	152,077	2,183,137	100.0	273,669	90.4	74.4	53.2	3.5	14.7	6.1	11.0
Total	152,077	2,183,137	100.0	273,669	90.4	74.4	53.2	3.5	14.7	6.1	11.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Chicago CSA	416	6,385	100.0	1,593	3.6	1.0	1.1	15.0	5.5	4.8	39.7	49.3	63.5	41.6	44.2	30.6	0.1	0.0	0.1
Total	416	6,385	100.0	1,593	3.6	1.0	1.1	15.0	5.5	4.8	39.7	49.3	63.5	41.6	44.2	30.6	0.1	0.0	0.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Chicago CSA	799	9,312	100.0	1,313	4.2	3.6	1.8	17.1	9.5	6.9	40.3	41.8	55.4	38.1	44.2	35.6	0.4	0.9	0.4		
Total	799	9,312	100.0	1,313	4.2	3.6	1.8	17.1	9.5	6.9	40.3	41.8	55.4	38.1	44.2	35.6	0.4	0.9	0.4		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Chicago CSA	416	6,385	100.0	1,593	94.9	63.7	61.1	3.1	12.7	2.1	23.6
Total	416	6,385	100.0	1,593	94.9	63.7	61.1	3.1	12.7	2.1	23.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Chicago CSA	799	9,312	100.0	1,313	96.1	71.6	57.3	2.2	15.6	1.7	12.8
Total	799	9,312	100.0	1,313	96.1	71.6	57.3	2.2	15.6	1.7	12.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	10,171	4,410,199	100.0	226,240	1.2	1.1	1.2	18.3	19.0	18.2	49.0	41.1	48.5	31.5	38.8	32.0	0.0	0.0	0.0
Total	10,171	4,410,199	100.0	226,240	1.2	1.1	1.2	18.3	19.0	18.2	49.0	41.1	48.5	31.5	38.8	32.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	2,774	1,674,029	100.0	109,078	1.2	1.7	1.2	17.4	20.4	18.1	50.8	43.2	50.5	30.4	34.6	30.1	0.1	0.1	0.1
Total	2,774	1,674,029	100.0	109,078	1.2	1.7	1.2	17.4	20.4	18.1	50.8	43.2	50.5	30.4	34.6	30.1	0.1	0.1	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	10,171	4,410,199	100.0	226,240	21.4	6.0	5.1	17.5	19.1	17.1	20.4	23.1	24.6	40.6	45.9	38.2	0.0	6.0	15.1
Total	10,171	4,410,199	100.0	226,240	21.4	6.0	5.1	17.5	19.1	17.1	20.4	23.1	24.6	40.6	45.9	38.2	0.0	6.0	15.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Portland CSA	2,774	1,674,029	100.0	109,078	20.2	8.3	5.6	18.3	17.9	17.2	21.3	20.7	25.0	40.2	43.1	40.1	0.0	10.0	12.0	
Total	2,774	1,674,029	100.0	109,078	20.2	8.3	5.6	18.3	17.9	17.2	21.3	20.7	25.0	40.2	43.1	40.1	0.0	10.0	12.0	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Portland CSA	19,657	518,507	100.0	84,733	3.1	2.2	3.2	22.0	19.5	22.1	41.3	40.6	41.9	31.9	36.5	31.5	1.7	1.1	1.3	
Total	19,657	518,507	100.0	84,733	3.1	2.2	3.2	22.0	19.5	22.1	41.3	40.6	41.9	31.9	36.5	31.5	1.7	1.1	1.3	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Portland CSA	31,252	443,241	100.0	80,224	1.8	1.2	1.6	20.7	17.6	21.5	45.0	43.2	45.2	31.7	37.4	31.0	0.7	0.6	0.7		
Total	31,252	443,241	100.0	80,224	1.8	1.2	1.6	20.7	17.6	21.5	45.0	43.2	45.2	31.7	37.4	31.0	0.7	0.6	0.7		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Portland CSA	19,657	518,507	100.0	84,733	90.5	63.1	50.8	3.0	14.7	6.4	22.2
Total	19,657	518,507	100.0	84,733	90.5	63.1	50.8	3.0	14.7	6.4	22.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Portland CSA	31,252	443,241	100.0	80,224	92.5	75.2	55.2	2.3	13.2	5.2	11.6
Total	31,252	443,241	100.0	80,224	92.5	75.2	55.2	2.3	13.2	5.2	11.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	393	5,386	100.0	1,649	1.8	1.5	0.8	14.3	9.2	7.6	55.1	62.3	62.5	28.4	26.7	28.9	0.4	0.3	0.2
Total	393	5,386	100.0	1,649	1.8	1.5	0.8	14.3	9.2	7.6	55.1	62.3	62.5	28.4	26.7	28.9	0.4	0.3	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	638	7,785	100.0	1,454	1.3	0.9	0.6	14.3	10.0	10.1	56.2	60.5	58.0	28.0	28.5	31.2	0.3	0.0	0.0
Total	638	7,785	100.0	1,454	1.3	0.9	0.6	14.3	10.0	10.1	56.2	60.5	58.0	28.0	28.5	31.2	0.3	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Portland CSA	393	5,386	100.0	1,649	95.9	67.2	56.5	2.7	14.8	1.4	18.1
Total	393	5,386	100.0	1,649	95.9	67.2	56.5	2.7	14.8	1.4	18.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Portland CSA	638	7,785	100.0	1,454	96.8	66.6	58.7	2.0	20.1	1.2	13.3
Total	638	7,785	100.0	1,454	96.8	66.6	58.7	2.0	20.1	1.2	13.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Louisville CSA	3,518	743,730	100.0	72,990	4.1	2.5	2.7	13.9	10.1	11.5	45.5	37.6	43.0	36.4	49.7	42.7	0.1	0.2	0.1		
Total	3,518	743,730	100.0	72,990	4.1	2.5	2.7	13.9	10.1	11.5	45.5	37.6	43.0	36.4	49.7	42.7	0.1	0.2	0.1		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Louisville CSA	1,113	256,192	100.0	43,927	2.9	3.6	3.0	17.9	15.5	17.2	43.7	40.6	43.2	35.1	40.2	36.3	0.4	0.1	0.4
Total	1,113	256,192	100.0	43,927	2.9	3.6	3.0	17.9	15.5	17.2	43.7	40.6	43.2	35.1	40.2	36.3	0.4	0.1	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Louisville CSA	3,518	743,730	100.0	72,990	21.1	10.5	8.5	17.5	25.3	20.0	20.0	21.2	20.0	41.4	39.4	33.2	0.0	3.5	18.3
Total	3,518	743,730	100.0	72,990	21.1	10.5	8.5	17.5	25.3	20.0	20.0	21.2	20.0	41.4	39.4	33.2	0.0	3.5	18.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Louisville CSA	1,113	256,192	100.0	43,927	20.6	15.1	11.1	18.2	24.9	21.7	20.3	20.9	21.1	40.9	35.0	32.2	0.0	4.0	13.9	
Total	1,113	256,192	100.0	43,927	20.6	15.1	11.1	18.2	24.9	21.7	20.3	20.9	21.1	40.9	35.0	32.2	0.0	4.0	13.9	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Louisville CSA	6,240	147,099	100.0	26,431	7.2	5.2	6.6	15.0	10.6	14.0	35.8	32.2	34.2	39.0	49.7	42.0	3.1	2.3	3.1		
Total	6,240	147,099	100.0	26,431	7.2	5.2	6.6	15.0	10.6	14.0	35.8	32.2	34.2	39.0	49.7	42.0	3.1	2.3	3.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Louisville CSA	9,820	126,301	100.0	25,528	5.5	3.7	4.4	18.5	12.8	16.8	38.4	35.2	38.2	36.1	47.4	39.3	1.4	0.9	1.3		
Total	9,820	126,301	100.0	25,528	5.5	3.7	4.4	18.5	12.8	16.8	38.4	35.2	38.2	36.1	47.4	39.3	1.4	0.9	1.3		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Louisville CSA	6,240	147,099	100.0	26,431	87.7	62.1	46.0	3.9	17.1	8.4	20.8
Total	6,240	147,099	100.0	26,431	87.7	62.1	46.0	3.9	17.1	8.4	20.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Louisville CSA	9,820	126,301	100.0	25,528	90.3	72.6	50.1	3.0	15.5	6.7	11.9
Total	9,820	126,301	100.0	25,528	90.3	72.6	50.1	3.0	15.5	6.7	11.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Louisville CSA	98	1,375	100.0	310	3.3	0.0	0.6	9.2	1.0	3.2	48.4	50.0	57.7	38.5	49.0	38.4	0.7	0.0	0.0
Total	98	1,375	100.0	310	3.3	0.0	0.6	9.2	1.0	3.2	48.4	50.0	57.7	38.5	49.0	38.4	0.7	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Louisville CSA	208	2,038	100.0	343	2.4	0.5	0.3	14.2	8.7	9.3	43.7	40.4	48.4	39.2	50.5	42.0	0.5	0.0	0.0
Total	208	2,038	100.0	343	2.4	0.5	0.3	14.2	8.7	9.3	43.7	40.4	48.4	39.2	50.5	42.0	0.5	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Louisville CSA	98	1,375	100.0	310	97.7	70.4	37.4	1.2	8.2	1.0	21.4
Total	98	1,375	100.0	310	97.7	70.4	37.4	1.2	8.2	1.0	21.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Louisville CSA	208	2,038	100.0	343	98.1	69.7	46.4	0.8	6.7	1.1	23.6
Total	208	2,038	100.0	343	98.1	69.7	46.4	0.8	6.7	1.1	23.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati CSA	3,568	810,186	100.0	125,135	4.2	3.1	3.4	14.3	10.9	12.4	42.3	36.8	40.8	39.2	49.1	43.2	0.1	0.1	0.1
Total	3,568	810,186	100.0	125,135	4.2	3.1	3.4	14.3	10.9	12.4	42.3	36.8	40.8	39.2	49.1	43.2	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati CSA	1,426	351,382	100.0	74,634	3.6	4.1	3.5	17.4	20.6	18.2	40.4	38.2	39.4	38.0	36.5	38.3	0.5	0.6	0.5
Total	1,426	351,382	100.0	74,634	3.6	4.1	3.5	17.4	20.6	18.2	40.4	38.2	39.4	38.0	36.5	38.3	0.5	0.6	0.5
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati CSA	3,568	810,186	100.0	125,135	21.9	8.3	7.7	16.4	21.5	18.7	19.8	21.8	20.9	42.0	44.9	37.1	0.0	3.5	15.6
Total	3,568	810,186	100.0	125,135	21.9	8.3	7.7	16.4	21.5	18.7	19.8	21.8	20.9	42.0	44.9	37.1	0.0	3.5	15.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati CSA	1,426	351,382	100.0	74,634	20.9	15.8	11.6	17.3	25.9	21.7	20.9	21.4	21.2	40.9	33.8	30.6	0.0	3.1	14.9
Total	1,426	351,382	100.0	74,634	20.9	15.8	11.6	17.3	25.9	21.7	20.9	21.4	21.2	40.9	33.8	30.6	0.0	3.1	14.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Cincinnati CSA	7,031	135,001	100.0	44,834	7.0	5.6	7.4	17.6	12.7	17.1	35.9	34.3	34.6	38.5	46.8	40.1	1.0	0.5	0.7	
Total	7,031	135,001	100.0	44,834	7.0	5.6	7.4	17.6	12.7	17.1	35.9	34.3	34.6	38.5	46.8	40.1	1.0	0.5	0.7	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Cincinnati CSA	12,626	153,609	100.0	42,849	5.9	3.4	5.5	19.3	14.0	18.2	33.7	32.2	35.2	39.9	49.6	40.0	1.2	0.7	1.1	
Total	12,626	153,609	100.0	42,849	5.9	3.4	5.5	19.3	14.0	18.2	33.7	32.2	35.2	39.9	49.6	40.0	1.2	0.7	1.1	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											SSSSSSSSSS
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Cincinnati CSA	7,031	135,001	100.0	44,834	82.9	64.4	49.4	5.5	14.3	11.6	21.4
Total	7,031	135,001	100.0	44,834	82.9	64.4	49.4	5.5	14.3	11.6	21.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Cincinnati CSA	12,626	153,609	100.0	42,849	90.3	75.1	52.1	2.8	12.7	6.8	12.2
Total	12,626	153,609	100.0	42,849	90.3	75.1	52.1	2.8	12.7	6.8	12.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Cincinnati CSA	53	562	100.0	299	3.8	3.8	3.0	12.7	13.2	8.4	47.6	43.4	57.9	35.7	39.6	30.1	0.2	0.0	0.7		
Total	53	562	100.0	299	3.8	3.8	3.0	12.7	13.2	8.4	47.6	43.4	57.9	35.7	39.6	30.1	0.2	0.0	0.7		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Cincinnati CSA	162	1,646	100.0	299	3.5	2.5	2.3	16.0	12.3	10.4	42.6	48.8	50.5	37.1	36.4	36.8	0.8	0.0	0.0
Total	162	1,646	100.0	299	3.5	2.5	2.3	16.0	12.3	10.4	42.6	48.8	50.5	37.1	36.4	36.8	0.8	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Cincinnati CSA	53	562	100.0	299	96.3	71.7	63.9	1.8	3.8	1.9	24.5
Total	53	562	100.0	299	96.3	71.7	63.9	1.8	3.8	1.9	24.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Cincinnati CSA	162	1,646	100.0	299	97.7	71.0	68.2	1.0	11.7	1.3	17.3
Total	162	1,646	100.0	299	97.7	71.0	68.2	1.0	11.7	1.3	17.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	16,516	9,389,891	100.0	583,355	4.3	4.3	3.6	16.8	13.7	14.5	37.1	28.9	37.4	41.7	52.7	44.3	0.1	0.3	0.2
Total	16,516	9,389,891	100.0	583,355	4.3	4.3	3.6	16.8	13.7	14.5	37.1	28.9	37.4	41.7	52.7	44.3	0.1	0.3	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	5,193	3,188,803	100.0	263,032	4.1	5.5	4.4	17.5	19.6	17.1	38.1	32.5	39.2	40.0	41.8	39.0	0.3	0.5	0.3
Total	5,193	3,188,803	100.0	263,032	4.1	5.5	4.4	17.5	19.6	17.1	38.1	32.5	39.2	40.0	41.8	39.0	0.3	0.5	0.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	16,516	9,389,891	100.0	583,355	22.1	6.7	7.0	16.7	19.5	17.1	19.9	18.9	20.4	41.3	47.3	32.9	0.0	7.5	22.6
Total	16,516	9,389,891	100.0	583,355	22.1	6.7	7.0	16.7	19.5	17.1	19.9	18.9	20.4	41.3	47.3	32.9	0.0	7.5	22.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023

DC CSA

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	5,193	3,188,803	100.0	263,032	21.6	12.9	9.1	16.8	23.3	20.3	20.5	19.5	21.9	41.1	36.9	31.9	0.0	7.4	16.9
Total	5,193	3,188,803	100.0	263,032	21.6	12.9	9.1	16.8	23.3	20.3	20.5	19.5	21.9	41.1	36.9	31.9	0.0	7.4	16.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	36,557	443,974	100.0	256,690	5.4	3.2	4.9	18.3	12.6	17.5	35.4	33.3	36.2	40.3	50.5	41.1	0.6	0.4	0.4
Total	36,557	443,974	100.0	256,690	5.4	3.2	4.9	18.3	12.6	17.5	35.4	33.3	36.2	40.3	50.5	41.1	0.6	0.4	0.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	85,055	1,026,168	100.0	240,546	5.3	2.9	4.5	19.7	12.8	17.7	36.1	33.7	36.8	38.1	50.1	40.4	0.8	0.5	0.6
Total	85,055	1,026,168	100.0	240,546	5.3	2.9	4.5	19.7	12.8	17.7	36.1	33.7	36.8	38.1	50.1	40.4	0.8	0.5	0.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
DC CSA	36,557	443,974	100.0	256,690	89.3	71.2	47.3	3.7	16.1	7.0	12.7
Total	36,557	443,974	100.0	256,690	89.3	71.2	47.3	3.7	16.1	7.0	12.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
DC CSA	85,055	1,026,168	100.0	240,546	91.3	74.7	52.0	2.8	14.4	6.0	10.9
Total	85,055	1,026,168	100.0	240,546	91.3	74.7	52.0	2.8	14.4	6.0	10.9
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
DC CSA	251	2,567	100.0	842	3.3	1.2	0.8	16.0	7.2	9.9	38.8	35.9	47.0	41.7	55.8	42.3	0.1	0.0	0.0
Total	251	2,567	100.0	842	3.3	1.2	0.8	16.0	7.2	9.9	38.8	35.9	47.0	41.7	55.8	42.3	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
DC CSA	601	6,260	100.0	832	3.3	1.8	1.3	17.2	17.8	12.0	39.2	31.8	46.3	39.9	48.3	40.4	0.4	0.3	0.0	
Total	601	6,260	100.0	832	3.3	1.8	1.3	17.2	17.8	12.0	39.2	31.8	46.3	39.9	48.3	40.4	0.4	0.3	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
DC CSA	251	2,567	100.0	842	95.6	74.9	51.2	2.6	10.0	1.8	15.1
Total	251	2,567	100.0	842	95.6	74.9	51.2	2.6	10.0	1.8	15.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
DC CSA	601	6,260	100.0	832	96.5	69.4	50.4	1.8	13.0	1.6	17.6
Total	601	6,260	100.0	832	96.5	69.4	50.4	1.8	13.0	1.6	17.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Boston CSA	23,049	10,915,572	100.0	461,420	3.4	3.5	4.2	13.3	14.1	13.8	44.6	37.9	42.5	38.6	44.2	39.3	0.1	0.2	0.1
Total	23,049	10,915,572	100.0	461,420	3.4	3.5	4.2	13.3	14.1	13.8	44.6	37.9	42.5	38.6	44.2	39.3	0.1	0.2	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Boston CSA	5,223	3,158,337	100.0	230,692	3.3	5.3	4.6	13.6	15.5	14.7	43.7	38.1	42.5	39.0	40.7	37.7	0.3	0.5	0.4
Total	5,223	3,158,337	100.0	230,692	3.3	5.3	4.6	13.6	15.5	14.7	43.7	38.1	42.5	39.0	40.7	37.7	0.3	0.5	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Boston CSA	23,049	10,915,572	100.0	461,420	23.0	4.7	5.4	16.4	21.6	18.3	19.7	22.4	23.3	40.9	46.5	38.7	0.0	4.8	14.3		
Total	23,049	10,915,572	100.0	461,420	23.0	4.7	5.4	16.4	21.6	18.3	19.7	22.4	23.3	40.9	46.5	38.7	0.0	4.8	14.3		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Boston CSA	5,223	3,158,337	100.0	230,692	22.3	8.7	7.0	16.5	22.3	19.9	20.3	21.8	24.0	40.8	40.3	36.8	0.0	6.9	12.3
Total	5,223	3,158,337	100.0	230,692	22.3	8.7	7.0	16.5	22.3	19.9	20.3	21.8	24.0	40.8	40.3	36.8	0.0	6.9	12.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Boston CSA	23,138	267,577	100.0	234,566	7.6	5.0	7.6	15.4	14.0	16.0	37.6	38.3	38.4	38.8	42.2	37.5	0.6	0.4	0.5		
Total	23,138	267,577	100.0	234,566	7.6	5.0	7.6	15.4	14.0	16.0	37.6	38.3	38.4	38.8	42.2	37.5	0.6	0.4	0.5		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Boston CSA	50,663	605,872	100.0	205,689	7.3	4.7	6.8	14.9	13.0	15.4	37.5	37.0	39.2	39.3	44.4	37.6	1.1	0.9	0.9		
Total	50,663	605,872	100.0	205,689	7.3	4.7	6.8	14.9	13.0	15.4	37.5	37.0	39.2	39.3	44.4	37.6	1.1	0.9	0.9		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Boston CSA	23,138	267,577	100.0	234,566	87.3	68.7	43.7	4.8	17.3	7.9	14.0
Total	23,138	267,577	100.0	234,566	87.3	68.7	43.7	4.8	17.3	7.9	14.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Boston CSA	50,663	605,872	100.0	205,689	89.4	72.4	49.1	3.8	15.7	6.8	11.9
Total	50,663	605,872	100.0	205,689	89.4	72.4	49.1	3.8	15.7	6.8	11.9
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Boston CSA	234	2,500	100.0	808	3.7	4.3	2.0	10.3	5.6	7.2	42.7	41.5	39.5	43.2	48.3	51.1	0.1	0.4	0.2
Total	234	2,500	100.0	808	3.7	4.3	2.0	10.3	5.6	7.2	42.7	41.5	39.5	43.2	48.3	51.1	0.1	0.4	0.2
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Boston CSA	434	4,932	100.0	647	3.4	4.8	2.9	11.8	7.4	8.5	42.7	38.5	39.6	41.7	49.3	48.8	0.4	0.0	0.2
Total	434	4,932	100.0	647	3.4	4.8	2.9	11.8	7.4	8.5	42.7	38.5	39.6	41.7	49.3	48.8	0.4	0.0	0.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Boston CSA	234	2,500	100.0	808	96.4	76.5	57.3	2.0	11.1	1.6	12.4
Total	234	2,500	100.0	808	96.4	76.5	57.3	2.0	11.1	1.6	12.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Boston CSA	434	4,932	100.0	647	96.9	74.4	68.0	1.7	12.7	1.5	12.9
Total	434	4,932	100.0	647	96.9	74.4	68.0	1.7	12.7	1.5	12.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Philadelphia CSA	11,707	3,715,103	100.0	318,181	3.6	1.6	2.1	18.4	16.9	16.1	41.5	35.9	41.8	36.5	45.6	39.9	0.0	0.0	0.0		
Total	11,707	3,715,103	100.0	318,181	3.6	1.6	2.1	18.4	16.9	16.1	41.5	35.9	41.8	36.5	45.6	39.9	0.0	0.0	0.0		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Philadelphia CSA	4,277	1,415,450	100.0	188,377	4.0	4.2	3.4	18.7	20.7	19.2	41.0	36.0	40.2	35.7	38.3	36.6	0.6	0.8	0.6
Total	4,277	1,415,450	100.0	188,377	4.0	4.2	3.4	18.7	20.7	19.2	41.0	36.0	40.2	35.7	38.3	36.6	0.6	0.8	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Philadelphia CSA	11,707	3,715,103	100.0	318,181	22.0	6.6	7.1	17.2	22.0	17.8	20.0	18.7	21.2	40.8	41.1	36.0	0.0	11.5	17.9	
Total	11,707	3,715,103	100.0	318,181	22.0	6.6	7.1	17.2	22.0	17.8	20.0	18.7	21.2	40.8	41.1	36.0	0.0	11.5	17.9	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Philadelphia CSA	4,277	1,415,450,853	100.0	188,377	21.7	11.6	9.3	17.3	23.5	20.3	20.1	20.0	21.7	40.9	33.9	32.7	0.0	11.1	15.9		
Total	4,277	1,415,450,853	100.0	188,377	21.7	11.6	9.3	17.3	23.5	20.3	20.1	20.0	21.7	40.9	33.9	32.7	0.0	11.1	15.9		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Philadelphia CSA	19,616	249,543	100.0	177,582	4.5	2.4	3.5	19.3	16.3	17.9	37.2	37.9	39.6	38.5	43.2	38.6	0.5	0.2	0.4		
Total	19,616	249,543	100.0	177,582	4.5	2.4	3.5	19.3	16.3	17.9	37.2	37.9	39.6	38.5	43.2	38.6	0.5	0.2	0.4		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Philadelphia CSA	42,450	524,366	100.0	160,862	4.8	2.5	3.6	19.4	15.2	18.6	35.3	36.5	37.7	38.5	44.3	38.4	2.0	1.5	1.7		
Total	42,450	524,366	100.0	160,862	4.8	2.5	3.6	19.4	15.2	18.6	35.3	36.5	37.7	38.5	44.3	38.4	2.0	1.5	1.7		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Philadelphia CSA	19,616	249,543	100.0	177,582	90.1	71.2	44.3	3.6	14.6	6.3	14.1
Total	19,616	249,543	100.0	177,582	90.1	71.2	44.3	3.6	14.6	6.3	14.1
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Philadelphia CSA	42,450	524,366	100.0	160,862	91.9	75.0	49.6	2.8	13.8	5.3	11.1
Total	42,450	524,366	100.0	160,862	91.9	75.0	49.6	2.8	13.8	5.3	11.1
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Philadelphia CSA	160	1,664	100.0	749	2.1	1.3	0.7	14.5	8.8	19.4	45.5	45.6	46.9	37.8	44.4	33.1	0.1	0.0	0.0
Total	160	1,664	100.0	749	2.1	1.3	0.7	14.5	8.8	19.4	45.5	45.6	46.9	37.8	44.4	33.1	0.1	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Philadelphia CSA	321	3,845	100.0	613	2.7	3.4	1.1	16.1	10.6	17.3	43.8	50.2	51.4	36.6	35.2	29.9	0.7	0.6	0.3
Total	321	3,845	100.0	613	2.7	3.4	1.1	16.1	10.6	17.3	43.8	50.2	51.4	36.6	35.2	29.9	0.7	0.6	0.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Philadelphia CSA	160	1,664	100.0	749	95.7	75.6	62.5	2.8	10.6	1.5	13.8
Total	160	1,664	100.0	749	95.7	75.6	62.5	2.8	10.6	1.5	13.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Philadelphia CSA	321	3,845	100.0	613	96.4	68.2	63.8	2.2	19.3	1.5	12.5
Total	321	3,845	100.0	613	96.4	68.2	63.8	2.2	19.3	1.5	12.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis CSA	6,428	1,792,728	100.0	157,704	5.7	0.9	1.8	17.6	8.6	12.6	38.0	33.4	38.7	38.7	57.0	46.8	0.1	0.2	0.1
Total	6,428	1,792,728	100.0	157,704	5.7	0.9	1.8	17.6	8.6	12.6	38.0	33.4	38.7	38.7	57.0	46.8	0.1	0.2	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis CSA	2,364	569,548	100.0	81,601	4.8	3.1	3.1	16.5	19.3	15.1	40.0	38.2	41.9	38.4	39.0	39.7	0.3	0.3	0.2
Total	2,364	569,548	100.0	81,601	4.8	3.1	3.1	16.5	19.3	15.1	40.0	38.2	41.9	38.4	39.0	39.7	0.3	0.3	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis CSA	6,428	1,792,728	100.0	157,704	21.7	6.0	8.0	16.9	19.4	16.8	19.6	22.0	19.2	41.8	49.4	32.8	0.0	3.2	23.3
Total	6,428	1,792,728	100.0	157,704	21.7	6.0	8.0	16.9	19.4	16.8	19.6	22.0	19.2	41.8	49.4	32.8	0.0	3.2	23.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
St. Louis CSA	2,364	569,548	100.0	81,601	20.6	14.4	11.2	17.6	29.0	19.8	20.8	21.8	19.5	41.0	31.9	29.4	0.0	2.9	20.1	
Total	2,364	569,548	100.0	81,601	20.6	14.4	11.2	17.6	29.0	19.8	20.8	21.8	19.5	41.0	31.9	29.4	0.0	2.9	20.1	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
St. Louis CSA	9,278	103,522	100.0	62,675	7.3	3.2	6.3	18.7	11.8	17.5	32.4	30.9	33.3	40.8	53.4	42.1	0.9	0.8	0.9		
Total	9,278	103,522	100.0	62,675	7.3	3.2	6.3	18.7	11.8	17.5	32.4	30.9	33.3	40.8	53.4	42.1	0.9	0.8	0.9		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
St. Louis CSA	20,431	233,049	100.0	60,490	7.4	3.3	6.2	15.3	8.8	14.4	33.5	31.8	36.6	43.0	55.3	42.0	0.8	0.8	0.9	
Total	20,431	233,049	100.0	60,490	7.4	3.3	6.2	15.3	8.8	14.4	33.5	31.8	36.6	43.0	55.3	42.0	0.8	0.8	0.9	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
St. Louis CSA	9,278	103,522	100.0	62,675	85.0	64.4	50.8	5.3	22.0	9.7	13.6
Total	9,278	103,522	100.0	62,675	85.0	64.4	50.8	5.3	22.0	9.7	13.6
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
St. Louis CSA	20,431	233,049	100.0	60,490	92.3	69.4	53.5	2.4	19.4	5.3	11.2
Total	20,431	233,049	100.0	60,490	92.3	69.4	53.5	2.4	19.4	5.3	11.2
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
St. Louis CSA	94	1,095	100.0	591	3.6	2.1	1.0	14.8	8.5	9.3	41.3	29.8	47.4	39.8	59.6	42.1	0.4	0.0	0.2
Total	94	1,095	100.0	591	3.6	2.1	1.0	14.8	8.5	9.3	41.3	29.8	47.4	39.8	59.6	42.1	0.4	0.0	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
St. Louis CSA	253	2,610	100.0	544	5.3	3.2	3.1	14.8	4.3	6.6	38.1	34.0	49.3	41.5	58.5	41.0	0.4	0.0	0.0		
Total	253	2,610	100.0	544	5.3	3.2	3.1	14.8	4.3	6.6	38.1	34.0	49.3	41.5	58.5	41.0	0.4	0.0	0.0		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
St. Louis CSA	94	1,095	100.0	591	96.2	72.3	58.5	2.3	9.6	1.5	18.1
Total	94	1,095	100.0	591	96.2	72.3	58.5	2.3	9.6	1.5	18.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
St. Louis CSA	253	2,610	100.0	544	97.8	68.4	61.4	1.2	14.6	1.0	17.0
Total	253	2,610	100.0	544	97.8	68.4	61.4	1.2	14.6	1.0	17.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Charlotte CSA	4,231	1,645,349	100.0	163,076	2.9	2.1	2.5	17.8	11.6	14.1	36.3	21.4	31.6	42.9	64.9	51.8	0.0	0.0	0.0	
Total	4,231	1,645,349	100.0	163,076	2.9	2.1	2.5	17.8	11.6	14.1	36.3	21.4	31.6	42.9	64.9	51.8	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	2,179	911,209	100.0	94,797	2.2	3.3	2.4	21.3	22.4	18.8	34.9	27.6	33.9	41.3	46.1	44.3	0.4	0.6	0.6
Total	2,179	911,209	100.0	94,797	2.2	3.3	2.4	21.3	22.4	18.8	34.9	27.6	33.9	41.3	46.1	44.3	0.4	0.6	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2020-2021			
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	4,231	1,645,349	100.0	163,076	21.8	3.6	4.5	16.6	11.5	14.1	18.6	15.6	19.0	43.0	63.3	46.8	0.0	6.0	15.6
Total	4,231	1,645,349	100.0	163,076	21.8	3.6	4.5	16.6	11.5	14.1	18.6	15.6	19.0	43.0	63.3	46.8	0.0	6.0	15.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	2,179	911,209	100.0	94,797	20.3	9.1	6.6	17.4	18.7	17.2	19.4	19.4	21.5	42.9	48.2	42.4	0.0	4.6	12.2
Total	2,179	911,209	100.0	94,797	20.3	9.1	6.6	17.4	18.7	17.2	19.4	19.4	21.5	42.9	48.2	42.4	0.0	4.6	12.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	6,303	73,134	100.0	76,747	6.6	5.2	6.5	17.7	12.2	17.3	28.3	25.4	29.4	46.7	57.0	46.3	0.6	0.2	0.5
Total	6,303	73,134	100.0	76,747	6.6	5.2	6.5	17.7	12.2	17.3	28.3	25.4	29.4	46.7	57.0	46.3	0.6	0.2	0.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Charlotte CSA	16,786	203,313	100.0	76,248	4.4	3.0	4.3	22.7	14.9	21.6	28.4	26.1	30.1	42.6	54.7	42.5	1.9	1.3	1.5		
Total	16,786	203,313	100.0	76,248	4.4	3.0	4.3	22.7	14.9	21.6	28.4	26.1	30.1	42.6	54.7	42.5	1.9	1.3	1.5		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charlotte CSA	6,303	73,134	100.0	76,747	88.7	73.6	47.2	3.4	13.9	7.9	12.4
Total	6,303	73,134	100.0	76,747	88.7	73.6	47.2	3.4	13.9	7.9	12.4
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charlotte CSA	16,786	203,313	100.0	76,248	92.2	78.4	52.7	2.1	11.9	5.7	9.7
Total	16,786	203,313	100.0	76,248	92.2	78.4	52.7	2.1	11.9	5.7	9.7
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	58	506	100.0	352	4.4	5.2	1.4	16.1	15.5	12.2	43.8	34.5	60.5	35.5	44.8	25.9	0.2	0.0	0.0
Total	58	506	100.0	352	4.4	5.2	1.4	16.1	15.5	12.2	43.8	34.5	60.5	35.5	44.8	25.9	0.2	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Charlotte CSA	129	1,522	100.0	357	2.8	1.6	0.8	23.9	17.1	30.3	38.8	45.7	47.9	33.7	34.9	21.0	0.7	0.8	0.0
Total	129	1,522	100.0	357	2.8	1.6	0.8	23.9	17.1	30.3	38.8	45.7	47.9	33.7	34.9	21.0	0.7	0.8	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charlotte CSA	58	506	100.0	352	96.4	87.9	50.0	2.2	1.7	1.4	10.3
Total	58	506	100.0	352	96.4	87.9	50.0	2.2	1.7	1.4	10.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charlotte CSA	129	1,522	100.0	357	97.5	79.1	53.5	1.3	7.0	1.2	14.0
Total	129	1,522	100.0	357	97.5	79.1	53.5	1.3	7.0	1.2	14.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Kansas City CSA	3,426	922,497	100.0	120,837	6.0	1.7	3.0	17.4	12.2	14.5	38.7	33.2	37.6	37.8	52.5	44.7	0.2	0.3	0.2	
Total	3,426	922,497	100.0	120,837	6.0	1.7	3.0	17.4	12.2	14.5	38.7	33.2	37.6	37.8	52.5	44.7	0.2	0.3	0.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City CSA	1,315	402,402	100.0	66,780	4.4	5.1	3.8	19.8	22.5	20.1	40.9	37.1	39.8	34.5	34.9	35.8	0.4	0.4	0.4
Total	1,315	402,402	100.0	66,780	4.4	5.1	3.8	19.8	22.5	20.1	40.9	37.1	39.8	34.5	34.9	35.8	0.4	0.4	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Kansas City CSA	3,426	922,497	100.0	120,837	21.1	6.9	7.4	17.4	22.9	17.8	20.3	21.7	20.2	41.3	45.3	34.7	0.0	3.3	19.9	
Total	3,426	922,497	100.0	120,837	21.1	6.9	7.4	17.4	22.9	17.8	20.3	21.7	20.2	41.3	45.3	34.7	0.0	3.3	19.9	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Kansas City CSA	1,315	402,402	100.0	66,780	20.1	12.3	9.4	17.4	25.2	19.6	21.7	22.4	20.7	40.8	36.4	32.6	0.0	3.7	17.7		
Total	1,315	402,402	100.0	66,780	20.1	12.3	9.4	17.4	25.2	19.6	21.7	22.4	20.7	40.8	36.4	32.6	0.0	3.7	17.7		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Kansas City CSA	8,404	94,183	100.0	48,830	7.2	4.0	6.8	18.4	13.5	18.1	34.0	29.7	32.5	38.5	51.3	40.5	1.9	1.5	2.1		
Total	8,404	94,183	100.0	48,830	7.2	4.0	6.8	18.4	13.5	18.1	34.0	29.7	32.5	38.5	51.3	40.5	1.9	1.5	2.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Kansas City CSA	18,375	208,460	100.0	47,030	5.7	2.8	5.2	23.1	13.2	18.8	34.4	31.2	33.8	34.3	50.9	39.6	2.6	1.9	2.6		
Total	18,375	208,460	100.0	47,030	5.7	2.8	5.2	23.1	13.2	18.8	34.4	31.2	33.8	34.3	50.9	39.6	2.6	1.9	2.6		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Kansas City CSA	8,404	94,183	100.0	48,830	85.4	65.1	47.3	4.9	20.7	9.7	14.2
Total	8,404	94,183	100.0	48,830	85.4	65.1	47.3	4.9	20.7	9.7	14.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Kansas City CSA	18,375	208,460	100.0	47,030	91.2	68.6	51.7	2.7	18.8	6.1	12.6
Total	18,375	208,460	100.0	47,030	91.2	68.6	51.7	2.7	18.8	6.1	12.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Kansas City CSA	133	1,197	100.0	826	4.9	0.8	1.0	15.2	3.8	4.5	41.2	52.6	63.8	38.3	42.9	30.8	0.4	0.0	0.0		
Total	133	1,197	100.0	826	4.9	0.8	1.0	15.2	3.8	4.5	41.2	52.6	63.8	38.3	42.9	30.8	0.4	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Kansas City CSA	291	2,864	100.0	619	4.1	1.7	1.3	19.4	10.0	7.3	43.5	50.5	63.2	32.1	37.5	27.8	0.9	0.3	0.5
Total	291	2,864	100.0	619	4.1	1.7	1.3	19.4	10.0	7.3	43.5	50.5	63.2	32.1	37.5	27.8	0.9	0.3	0.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Kansas City CSA	133	1,197	100.0	826	96.0	79.7	61.5	2.3	5.3	1.7	15.0
Total	133	1,197	100.0	826	96.0	79.7	61.5	2.3	5.3	1.7	15.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Kansas City CSA	291	2,864	100.0	619	97.5	73.5	58.6	1.4	8.6	1.1	17.9
Total	291	2,864	100.0	619	97.5	73.5	58.6	1.4	8.6	1.1	17.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	120	15,102	100.0	3,736	0.0	0.0	0.0	12.0	8.3	9.7	68.8	59.2	64.0	19.2	32.5	26.3	0.0	0.0	0.0
Total	120	15,102	100.0	3,736	0.0	0.0	0.0	12.0	8.3	9.7	68.8	59.2	64.0	19.2	32.5	26.3	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Wheeling MMSA	54	7,260	100.0	2,757	1.2	3.7	0.9	17.3	11.1	14.4	60.2	51.9	55.9	20.8	33.3	28.4	0.5	0.0	0.4	
Total	54	7,260	100.0	2,757	1.2	3.7	0.9	17.3	11.1	14.4	60.2	51.9	55.9	20.8	33.3	28.4	0.5	0.0	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Wheeling MMSA	120	15,102	100.0	3,736	19.1	9.2	6.8	19.3	24.2	17.2	20.9	17.5	21.3	40.7	36.7	37.6	0.0	12.5	17.1		
Total	120	15,102	100.0	3,736	19.1	9.2	6.8	19.3	24.2	17.2	20.9	17.5	21.3	40.7	36.7	37.6	0.0	12.5	17.1		

Wheeling MMSA

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	54	7,260	100.0	2,757	20.9	18.5	11.5	17.3	33.3	22.6	20.6	14.8	21.7	41.3	24.1	29.2	0.0	9.3	14.9
Total	54	7,260	100.0	2,757	20.9	18.5	11.5	17.3	33.3	22.6	20.6	14.8	21.7	41.3	24.1	29.2	0.0	9.3	14.9

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	247	5,798	100.0	1,955	0.0	0.0	0.0	20.8	17.0	20.0	58.3	59.9	59.9	20.9	23.1	20.1	0.0	0.0	0.0
Total	247	5,798	100.0	1,955	0.0	0.0	0.0	20.8	17.0	20.0	58.3	59.9	59.9	20.9	23.1	20.1	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	505	5,607	100.0	1,960	0.6	1.0	0.6	26.3	22.4	24.1	44.2	44.0	48.0	27.9	32.3	26.2	1.1	0.4	1.1
Total	505	5,607	100.0	1,960	0.6	1.0	0.6	26.3	22.4	24.1	44.2	44.0	48.0	27.9	32.3	26.2	1.1	0.4	1.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Wheeling MMSA	247	5,798	100.0	1,955	79.9	57.5	45.5	5.5	19.8	14.5	22.7
Total	247	5,798	100.0	1,955	79.9	57.5	45.5	5.5	19.8	14.5	22.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Wheeling MMSA	505	5,607	100.0	1,960	84.2	72.3	49.2	4.2	15.1	11.6	12.7
Total	505	5,607	100.0	1,960	84.2	72.3	49.2	4.2	15.1	11.6	12.7
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	5	23	100.0	51	0.0	0.0	0.0	9.5	0.0	2.0	66.7	60.0	82.4	23.9	40.0	15.7	0.0	0.0	0.0
Total	5	23	100.0	51	0.0	0.0	0.0	9.5	0.0	2.0	66.7	60.0	82.4	23.9	40.0	15.7	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Wheeling MMSA	16	219	100.0	59	1.5	0.0	0.0	14.6	6.3	8.5	59.0	93.8	76.3	24.6	0.0	15.3	0.4	0.0	0.0
Total	16	219	100.0	59	1.5	0.0	0.0	14.6	6.3	8.5	59.0	93.8	76.3	24.6	0.0	15.3	0.4	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Wheeling MMSA	5	23	100.0	51	96.3	80.0	56.9	1.8	0.0	1.8	20.0
Total	5	23	100.0	51	96.3	80.0	56.9	1.8	0.0	1.8	20.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Wheeling MMSA	16	219	100.0	59	96.9	87.5	55.9	1.7	0.0	1.5		12.5
Total	16	219	100.0	59	96.9	87.5	55.9	1.7	0.0	1.5		12.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	1,037	230,578	100.0	38,999	2.8	2.2	3.2	12.9	7.8	13.2	41.5	33.8	39.0	42.7	56.1	44.6	0.0	0.0	0.0
Total	1,037	230,578	100.0	38,999	2.8	2.2	3.2	12.9	7.8	13.2	41.5	33.8	39.0	42.7	56.1	44.6	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	512	120,289	100.0	24,275	2.4	2.9	4.3	13.4	16.8	16.4	42.5	35.5	40.0	41.7	44.7	39.3	0.0	0.0	0.0
Total	512	120,289	100.0	24,275	2.4	2.9	4.3	13.4	16.8	16.4	42.5	35.5	40.0	41.7	44.7	39.3	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Allentown MMSA	1,037	230,578	100.0	38,999	20.1	4.1	6.9	17.6	17.2	18.0	20.9	24.6	22.4	41.3	49.5	35.6	0.0	4.7	17.2	
Total	1,037	230,578	100.0	38,999	20.1	4.1	6.9	17.6	17.2	18.0	20.9	24.6	22.4	41.3	49.5	35.6	0.0	4.7	17.2	

Allentown MMSA

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	512	120,289,259	100.0	24,275	20.0	10.0	8.4	17.7	23.8	20.4	20.9	25.2	22.5	41.4	36.3	33.3	0.0	4.7	15.3
Total	512	120,289,259	100.0	24,275	20.0	10.0	8.4	17.7	23.8	20.4	20.9	25.2	22.5	41.4	36.3	33.3	0.0	4.7	15.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	2,121	28,040	100.0	20,236	7.1	3.3	5.2	15.9	12.8	15.3	37.1	35.8	38.1	39.9	48.1	41.4	0.0	0.0	0.0
Total	2,121	28,040	100.0	20,236	7.1	3.3	5.2	15.9	12.8	15.3	37.1	35.8	38.1	39.9	48.1	41.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	4,192	50,202	100.0	19,257	6.6	4.5	4.8	19.2	13.9	17.7	36.4	35.3	37.2	37.8	46.3	40.3	0.0	0.0	0.0
Total	4,192	50,202	100.0	19,257	6.6	4.5	4.8	19.2	13.9	17.7	36.4	35.3	37.2	37.8	46.3	40.3	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Allentown MMSA	2,121	28,040	100.0	20,236	88.6	67.2	49.8	3.6	16.5	7.8	16.3
Total	2,121	28,040	100.0	20,236	88.6	67.2	49.8	3.6	16.5	7.8	16.3
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Allentown MMSA	4,192	50,202	100.0	19,257	90.6	73.0	55.0	2.8	15.5	6.6	11.5
Total	4,192	50,202	100.0	19,257	90.6	73.0	55.0	2.8	15.5	6.6	11.5
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	45	358	100.0	159	1.8	0.0	0.0	7.1	0.0	1.3	42.5	35.6	46.5	48.6	64.4	52.2	0.0	0.0	0.0
Total	45	358	100.0	159	1.8	0.0	0.0	7.1	0.0	1.3	42.5	35.6	46.5	48.6	64.4	52.2	0.0	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Allentown MMSA	65	748	100.0	124	1.2	0.0	0.0	8.6	9.2	2.4	42.7	50.8	51.6	47.6	40.0	46.0	0.0	0.0	0.0
Total	65	748	100.0	124	1.2	0.0	0.0	8.6	9.2	2.4	42.7	50.8	51.6	47.6	40.0	46.0	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Allentown MMSA	45	358	100.0	159	97.4	84.4	62.9	1.5	8.9	1.1	6.7
Total	45	358	100.0	159	97.4	84.4	62.9	1.5	8.9	1.1	6.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Allentown MMSA	65	748	100.0	124	97.3	78.5	66.9	1.4	10.8	1.2	10.8
Total	65	748	100.0	124	97.3	78.5	66.9	1.4	10.8	1.2	10.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Omaha MMSA	664	169,080	100.0	52,135	5.2	2.0	3.3	19.7	10.2	15.1	40.5	34.8	36.8	34.5	53.0	44.7	0.0	0.0	0.0
Total	664	169,080	100.0	52,135	5.2	2.0	3.3	19.7	10.2	15.1	40.5	34.8	36.8	34.5	53.0	44.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Omaha MMSA	361	92,088	100.0	29,236	2.8	3.6	2.7	20.1	21.3	18.1	40.8	33.0	37.0	36.3	42.1	42.2	0.0	0.0	0.0
Total	361	92,088	100.0	29,236	2.8	3.6	2.7	20.1	21.3	18.1	40.8	33.0	37.0	36.3	42.1	42.2	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Omaha MMSA	664	169,080	100.0	52,135	21.0	6.0	7.3	17.8	18.2	18.5	21.1	25.3	20.2	40.1	49.4	31.7	0.0	1.1	22.3
Total	664	169,080	100.0	52,135	21.0	6.0	7.3	17.8	18.2	18.5	21.1	25.3	20.2	40.1	49.4	31.7	0.0	1.1	22.3

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Omaha MMSA	361	92,088	100.0	29,236	19.5	12.5	7.7	18.3	26.9	19.1	22.6	22.4	21.3	39.6	36.6	32.6	0.0	1.7	19.3
Total	361	92,088	100.0	29,236	19.5	12.5	7.7	18.3	26.9	19.1	22.6	22.4	21.3	39.6	36.6	32.6	0.0	1.7	19.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2020-2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha MMSA	2,955	31,828	100.0	18,351	6.9	3.7	6.2	16.5	12.7	14.4	42.9	39.5	42.6	33.7	44.2	36.9	0.0	0.0	0.0
Total	2,955	31,828	100.0	18,351	6.9	3.7	6.2	16.5	12.7	14.4	42.9	39.5	42.6	33.7	44.2	36.9	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha MMSA	6,494	76,876	100.0	17,839	3.9	1.5	2.8	19.7	12.4	17.5	38.5	34.6	38.2	38.0	51.5	41.5	0.0	0.0	0.0
Total	6,494	76,876	100.0	17,839	3.9	1.5	2.8	19.7	12.4	17.5	38.5	34.6	38.2	38.0	51.5	41.5	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Omaha MMSA	2,955	31,828	100.0	18,351	84.6	65.2	54.7	5.2	22.6	10.2	12.1
Total	2,955	31,828	100.0	18,351	84.6	65.2	54.7	5.2	22.6	10.2	12.1
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Omaha MMSA	6,494	76,876	100.0	17,839	89.3	68.7	50.5	3.3	19.8	7.4	11.5
Total	6,494	76,876	100.0	17,839	89.3	68.7	50.5	3.3	19.8	7.4	11.5
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Omaha MMSA	45	447	100.0	442	3.2	0.0	1.4	10.4	4.4	3.8	49.5	40.0	50.2	36.8	55.6	44.6	0.0	0.0	0.0
Total	45	447	100.0	442	3.2	0.0	1.4	10.4	4.4	3.8	49.5	40.0	50.2	36.8	55.6	44.6	0.0	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Omaha MMSA	94	1,064	100.0	386	2.4	1.1	1.0	13.0	1.1	5.2	47.9	60.6	69.4	36.6	37.2	24.4	0.0	0.0	0.0
Total	94	1,064	100.0	386	2.4	1.1	1.0	13.0	1.1	5.2	47.9	60.6	69.4	36.6	37.2	24.4	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Omaha MMSA	45	447	100.0	442	97.2	77.8	68.6	1.6	0.0	1.2	22.2
Total	45	447	100.0	442	97.2	77.8	68.6	1.6	0.0	1.2	22.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Omaha MMSA	94	1,064	100.0	386	97.6	73.4	59.6	1.2	12.8	1.2	13.8
Total	94	1,064	100.0	386	97.6	73.4	59.6	1.2	12.8	1.2	13.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Auburn MSA	130	28,911	10.7	8,897	1.8	0.0	0.3	12.5	18.5	13.4	70.9	65.4	69.9	14.3	15.4	15.5	0.5	0.8	0.9	
Limited-Scope:																				
Birmingham MSA	770	227,293	63.5	46,824	6.4	1.9	1.9	18.0	6.4	9.4	29.9	21.7	26.8	45.6	70.0	61.9	0.1	0.0	0.0	
Tuscaloosa MSA	313	71,883	25.8	9,991	1.2	0.0	0.2	12.0	5.1	7.6	41.7	35.5	35.8	44.6	58.5	55.7	0.5	1.0	0.7	
Total	1,213	328,087	100.0	65,712	5.2	1.2	1.4	16.5	7.3	9.6	36.2	29.9	34.0	42.0	61.2	54.7	0.2	0.3	0.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Auburn MSA	47	11,088	10.8	5,764	2.3	0.0	1.6	21.3	17.0	20.0	48.4	59.6	48.1	25.2	19.1	28.2	2.8	4.3	2.2
Limited-Scope:																			
Birmingham MSA	262	67,998	60.4	28,062	4.8	3.1	2.5	18.3	16.0	12.5	34.0	34.7	34.6	42.1	45.4	50.2	0.8	0.8	0.2
Tuscaloosa MSA	125	53,229	28.8	6,289	4.5	0.0	2.2	7.6	6.4	6.3	45.1	36.0	40.1	39.7	48.8	46.2	3.3	8.8	5.1
Total	434	132,315	100.0	40,115	4.4	1.8	2.3	17.1	13.4	12.6	37.4	37.8	37.4	39.7	43.5	46.4	1.4	3.5	1.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Auburn MSA	130	28,911	10.7	8,897	24.8	5.4	5.6	15.2	21.5	17.6	18.6	23.1	21.2	41.4	45.4	36.0	0.0	4.6	19.6
Limited-Scope:																			
Birmingham MSA	770	227,293	63.5	46,824	23.1	3.4	5.5	15.0	10.5	15.9	17.6	16.6	19.4	44.4	61.3	41.1	0.0	8.2	18.1
Tuscaloosa MSA	313	71,883	25.8	9,991	22.3	1.6	3.7	15.4	14.1	13.5	17.6	21.1	18.3	44.7	58.5	34.2	0.0	4.8	30.2
Total	664	328,087	100.0	52,135	21.0	6.0	7.3	17.8	18.2	18.5	21.1	25.3	20.2	40.1	49.4	31.7	0.0	1.1	22.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Auburn MSA	47	11,088	10.8	5,764	23.5	10.6	7.9	15.5	19.1	20.0	19.7	21.3	23.0	41.2	46.8	33.7	0.0	2.1	15.5
Limited-Scope:																			
Birmingham MSA	262	67,998	60.4	28,062	21.4	9.9	8.0	16.4	22.1	19.1	18.3	17.6	20.0	43.9	45.8	39.3	0.0	4.6	13.7
Tuscaloosa MSA	125	53,229	28.8	6,289	21.4	8.8	4.2	16.3	28.0	16.1	18.8	19.2	19.4	43.5	40.8	37.0	0.0	3.2	23.3
Total	434	132,315	100.0	40,115	21.7	9.7	7.4	16.3	23.5	18.7	18.5	18.4	20.3	43.5	44.5	38.1	0.0	3.9	15.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate		
Full-Scope:																					
Auburn MSA	395	4,877	14.3	3,506	1.5	0.3	0.7	32.3	20.5	28.6	53.4	59.0	57.0	11.6	20.0	13.0	1.1	0.3	0.7		
Limited-Scope:																					
Birmingham MSA	2,032	21,930	73.7	23,644	8.1	5.8	7.7	20.0	11.7	17.3	25.0	23.2	23.7	45.3	58.5	50.4	1.5	0.9	0.9		
Tuscaloosa MSA	331	3,206	12.0	4,590	1.4	0.6	1.3	24.6	18.7	23.7	37.7	30.5	35.9	33.7	48.9	38.3	2.7	1.2	0.9		
Total	2,758	30,013	100.0	31,740	6.6	4.4	6.0	21.9	13.8	19.5	29.6	29.2	29.1	40.3	51.8	44.5	1.6	0.8	0.9		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Auburn MSA	883	9,525	14.5	3,273	2.1	1.5	1.3	20.0	18.9	20.4	42.6	41.5	43.1	27.0	33.7	28.2	8.3	4.4	7.0
Limited-Scope:																			
Birmingham MSA	4,448	53,237	73.3	20,836	8.2	5.4	7.3	14.9	7.7	13.5	27.6	25.0	27.8	47.7	61.6	50.4	1.7	0.4	1.0
Tuscaloosa MSA	739	8,579	12.2	3,985	5.5	3.4	5.3	10.2	4.1	9.8	45.0	36.7	43.4	33.6	50.3	36.7	5.8	5.5	4.8
Total	6,070	71,341	100.0	28,094	7.2	4.6	6.3	14.8	8.9	13.8	31.4	28.8	31.8	43.7	56.1	45.9	2.9	1.6	2.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Auburn MSA	395	4,877	14.3	3,506	84.0	68.6	39.8	4.1	14.2	11.9	17.2
Limited-Scope:											
Birmingham MSA	2,032	21,930	73.7	23,644	83.3	63.2	41.4	5.7	21.6	11.0	15.2
Tuscaloosa MSA	331	3,206	12.0	4,590	83.0	63.4	42.4	5.3	19.3	11.7	17.2
Total	2,758	30,013	100.0	31,740	83.4	64.0	41.4	5.4	20.3	11.2	15.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Auburn MSA	883	9,525	14.5	3,273	89.0	73.8	48.2	2.3	11.1	8.7	15.1
Limited-Scope:											
Birmingham MSA	4,448	53,237	73.3	20,836	88.8	69.1	43.3	3.3	18.2	7.9	12.7
Tuscaloosa MSA	739	8,579	12.2	3,985	88.2	70.4	48.0	3.2	17.2	8.6	12.4
Total	6,070	71,341	100.0	28,094	88.8	70.0	44.5	3.2	17.0	8.1	13.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Auburn MSA	9	104	33.3	39	1.1	0.0	0.0	18.6	55.6	7.7	66.4	33.3	82.1	13.9	11.1	10.3	0.0	0.0	0.0	
Limited-Scope:																				
Birmingham MSA	16	156	59.3	101	4.2	0.0	2.0	14.1	0.0	6.9	25.7	12.5	31.7	55.4	87.5	59.4	0.7	0.0	0.0	
Tuscaloosa MSA	2	8	7.4	53	0.3	0.0	1.9	13.1	0.0	24.5	39.8	50.0	41.5	46.6	50.0	32.1	0.3	0.0	0.0	
Total	27	268	100.0	193	3.1	0.0	1.6	14.5	18.5	11.9	33.6	22.2	44.6	48.3	59.3	42.0	0.5	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Auburn MSA	13	151	17.1	31	3.0	0.0	0.0	21.6	23.1	25.8	42.0	46.2	58.1	28.9	23.1	12.9	4.5	7.7	3.2
Limited-Scope:																			
Birmingham MSA	48	451	63.2	64	4.5	2.1	1.6	13.1	2.1	4.7	35.7	20.8	32.8	46.0	75.0	60.9	0.7	0.0	0.0
Tuscaloosa MSA	15	121	19.7	47	2.2	13.3	4.3	9.5	6.7	10.6	42.5	20.0	34.0	43.4	60.0	51.1	2.4	0.0	0.0
Total	76	723	100.0	142	3.9	3.9	2.1	13.6	6.6	11.3	37.7	25.0	38.7	43.2	63.2	47.2	1.5	1.3	0.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Auburn MSA	9	104	33.3	39	94.3	66.7	51.3	2.1	0.0	3.6	33.3
Limited-Scope:											
Birmingham MSA	16	156	59.3	101	94.9	68.8	40.6	3.1	25.0	1.9	6.3
Tuscaloosa MSA	2	8	7.4	53	97.5	50.0	39.6	1.6	0.0	0.8	50.0
Total	27	268	100.0	193	95.3	66.7	42.5	2.7	14.8	2.0	18.5
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Auburn MSA	13	151	17.1	31	94.2	76.9	64.5	1.7	7.7	4.1	15.4
Limited-Scope:											
Birmingham MSA	48	451	63.2	64	95.6	75.0	48.4	1.9	6.3	2.5	18.8
Tuscaloosa MSA	15	121	19.7	47	97.8	100.0	63.8	1.0	0.0	1.2	0.0
Total	76	723	100.0	142	95.8	80.3	57.0	1.7	5.3	2.5	14.5
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Phoenix CSA	27,364	9,102,197	78.5	433,174	4.4	2.9	3.3	19.4	14.0	14.5	37.7	33.8	39.6	38.5	48.9	42.1	0.0	0.4	0.5		
Limited-Scope:																					
Flagstaff MSA	564	225,758	1.6	8,936	3.5	0.0	0.0	18.2	10.1	11.6	35.6	27.7	34.9	42.7	61.9	53.1	0.0	0.4	0.3		
Lake Havasu MSA	741	175,748	2.1	17,722	0.0	0.0	0.0	9.2	1.5	3.0	72.3	70.3	72.3	18.5	28.2	24.7	0.0	0.0	0.0		
Prescott Valley MSA	1,083	311,083	3.1	19,949	0.0	0.0	0.0	18.7	11.9	16.4	61.2	62.9	64.7	20.1	25.2	18.9	0.0	0.0	0.0		
Sierra Vista MSA	202	33,757	0.6	7,278	2.3	3.0	1.9	26.6	23.8	24.2	44.2	34.2	36.6	26.9	39.1	37.3	0.0	0.0	0.0		
Tucson CSA	4,282	1,163,543	12.3	76,491	4.5	2.5	3.1	21.6	15.7	15.5	34.1	29.1	33.3	39.7	52.7	48.1	0.0	0.0	0.0		
Yuma MSA	314	50,003	0.9	12,373	0.0	0.0	0.0	25.7	29.9	15.7	47.0	36.0	40.6	27.3	34.1	43.7	0.0	0.0	0.0		
Non-MSA AZ	303	71,600	0.9	7,659	1.4	0.0	0.0	31.1	16.5	13.4	30.9	34.7	33.6	36.6	48.8	53.0	0.0	0.0	0.0		
Total	34,853	11,133,689	100.0	583,582	3.8	2.6	2.9	20.0	14.1	14.4	39.6	34.9	40.4	36.6	48.2	41.9	0.0	0.3	0.4		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Phoenix CSA	6,456	2,805,022	71.5	214,326	2.5	2.4	2.1	21.5	16.8	18.4	37.0	35.2	40.1	38.8	45.5	39.3	0.2	0.1	0.1	
Limited-Scope:																				
Flagstaff MSA	155	124,734	1.7	4,384	0.1	0.0	0.1	22.3	5.8	6.0	51.6	61.3	62.3	26.0	32.9	31.5	0.0	0.0	0.0	
Lake Havasu MSA	280	67,675	3.1	9,639	0.0	0.0	0.0	12.4	5.7	9.3	59.6	61.1	56.6	27.0	31.8	32.3	1.0	1.4	1.8	
Prescott Valley MSA	340	124,096	3.8	10,918	0.0	0.0	0.0	16.9	14.1	16.8	67.3	67.9	68.8	15.8	17.9	14.4	0.0	0.0	0.0	
Sierra Vista MSA	90	15,452	1.0	4,349	0.0	0.0	0.0	17.9	16.7	13.4	56.7	55.6	51.7	25.3	27.8	34.9	0.1	0.0	0.0	
Tucson CSA	1,450	384,829	16.1	38,883	1.9	2.1	1.8	26.1	25.4	21.9	31.2	30.0	31.1	40.1	41.9	44.7	0.8	0.6	0.5	
Yuma MSA	158	27,239	1.8	6,747	0.8	0.6	0.6	18.0	19.6	14.1	49.4	38.6	39.0	31.4	40.5	45.8	0.3	0.6	0.6	
Non-MSA AZ	97	22,017	1.1	4,398	2.7	1.0	0.4	23.4	10.3	6.5	37.9	44.3	45.6	36.0	44.3	47.5	0.0	0.0	0.0	
Total	9,026	3,571,064	100.0	293,644	2.1	2.1	1.8	21.6	17.5	18.0	39.3	37.2	41.0	36.8	43.0	39.0	0.3	0.2	0.2	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Phoenix CSA	27,364	9,102,197	78.5	433,174	21.9	8.1	5.3	17.3	20.4	16.5	19.5	20.5	20.5	41.3	46.0	38.6	0.0	5.0	19.0		
Limited-Scope:																					
Flagstaff MSA	564	225,758	1.6	8,936	24.0	2.7	3.0	15.6	11.9	11.3	17.2	16.3	18.5	43.2	63.3	49.0	0.0	5.9	18.3		
Lake Havasu MSA	741	175,748	2.1	17,722	18.5	7.8	4.0	19.3	15.7	11.6	22.2	19.6	17.0	40.0	54.0	46.6	0.0	3.0	20.7		
Prescott Valley MSA	1,083	311,083	3.1	19,949	18.8	5.5	4.3	19.3	16.7	14.2	22.4	20.7	18.8	39.6	53.0	42.7	0.0	4.1	20.0		
Sierra Vista MSA	202	33,757	0.6	7,278	23.1	12.9	7.0	16.0	19.8	13.8	19.9	20.8	15.7	41.1	41.6	27.4	0.0	5.0	36.2		
Tucson CSA	4,282	1,163,543	12.3	76,491	22.2	7.1	5.0	17.4	19.3	14.1	19.1	22.6	19.4	41.3	47.9	36.2	0.0	3.1	25.2		
Yuma MSA	314	50,003	0.9	12,373	20.0	8.3	1.9	19.1	21.0	11.1	19.6	19.4	18.2	41.3	46.8	39.4	0.0	4.5	29.3		
Non-MSA AZ	303	71,600	0.9	7,659	23.8	1.7	1.6	16.4	7.6	7.8	17.9	16.5	15.1	41.9	67.0	54.2	0.0	7.3	21.2		
Total	34,853	11,133,689	100.0	583,582	21.8	7.8	5.1	17.4	19.8	15.6	19.6	20.6	20.0	41.2	47.0	38.9	0.0	4.8	20.4		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Phoenix CSA	6,456	2,805,022	71.5	214,326	20.6	10.7	6.9	18.3	18.5	16.2	20.3	18.8	21.2	40.9	45.7	38.7	0.0	6.3	17.0	
Limited-Scope:																				
Flagstaff MSA	155	124,734	1.7	4,384	20.9	2.6	4.2	16.9	12.9	10.6	21.6	11.6	17.5	40.7	65.2	52.3	0.0	7.7	15.4	
Lake Havasu MSA	280	67,675	3.1	9,639	18.5	6.1	6.5	19.1	19.3	13.7	22.6	22.9	18.7	39.8	48.2	44.3	0.0	3.6	16.8	
Prescott Valley MSA	340	124,096	3.8	10,918	20.0	7.6	7.8	18.1	14.1	14.5	23.2	24.1	21.4	38.8	47.6	41.0	0.0	6.5	15.3	
Sierra Vista MSA	90	15,452	1.0	4,349	20.5	10.0	6.6	18.0	22.2	14.0	20.5	31.1	18.4	41.0	35.6	36.6	0.0	1.1	24.5	
Tucson CSA	1,450	384,829	16.1	38,883	21.8	11.9	8.0	17.5	22.1	16.8	19.6	23.0	21.9	41.1	39.2	33.6	0.0	3.8	19.7	
Yuma MSA	158	27,239	1.8	6,747	22.1	7.6	3.1	17.4	21.5	11.9	19.9	20.9	20.6	40.6	45.6	43.0	0.0	4.4	21.4	
Non-MSA AZ	97	22,017	1.1	4,398	23.1	3.1	2.5	16.6	9.3	8.8	18.3	21.6	15.2	42.0	55.7	57.2	0.0	10.3	16.3	
Total	9,026	3,571,064	100.0	293,644	20.8	10.3	6.8	18.1	18.8	15.8	20.3	19.9	21.0	40.8	45.1	38.9	0.0	5.8	17.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Phoenix CSA	45,662	1,466,573	78.8	140,245	6.8	4.7	6.4	15.4	13.9	16.4	31.2	28.4	29.4	46.1	52.4	47.1	0.5	0.7	0.6		
Limited-Scope:																					
Flagstaff MSA	1,005	33,111	1.7	3,316	0.1	0.0	0.2	17.7	22.3	22.2	32.3	26.7	31.7	48.6	50.0	45.5	1.4	1.1	0.5		
Lake Havasu MSA	970	30,342	1.7	4,347	0.0	0.0	0.0	4.1	1.3	4.2	71.6	74.3	73.4	24.3	24.3	22.4	0.0	0.0	0.0		
Prescott Valley MSA	2,198	67,911	3.8	6,471	0.0	0.0	0.0	21.2	20.2	22.9	51.5	48.8	52.0	27.3	31.1	25.2	0.0	0.0	0.0		
Sierra Vista MSA	376	10,839	0.6	1,831	3.9	1.3	4.0	29.2	24.5	31.8	41.8	42.6	38.2	25.2	31.6	25.9	0.0	0.0	0.0		
Tucson CSA	6,619	227,264	11.4	21,981	5.8	6.5	6.5	22.8	22.0	25.3	29.3	28.8	30.2	41.1	41.9	37.0	1.0	0.9	1.0		
Yuma MSA	542	13,047	0.9	2,836	0.0	0.0	0.0	27.8	28.8	30.6	38.7	41.1	38.1	33.5	30.1	31.3	0.0	0.0	0.0		
Non-MSA AZ	596	19,020	1.0	1,956	0.0	0.0	0.2	16.2	12.8	17.1	35.3	31.5	32.3	48.4	55.7	50.4	0.0	0.0	0.1		
Total	57,968	1,868,107	100.0	182,983	6.1	4.4	5.7	16.6	15.2	17.9	32.6	30.2	31.7	44.2	49.5	44.1	0.5	0.7	0.6		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix CSA	68,330	1,040,748	79.6	141,608	3.9	2.1	3.5	18.5	13.6	18.3	29.9	28.9	30.1	47.2	55.0	47.5	0.5	0.4	0.6
Limited-Scope:																			
Flagstaff MSA	1,374	21,186	1.6	2,945	1.2	0.6	0.4	10.6	8.6	9.6	59.7	57.7	60.0	28.3	33.1	29.9	0.1	0.0	0.0
Lake Havasu MSA	1,503	25,729	1.8	4,554	0.0	0.0	0.0	9.1	4.3	7.7	63.1	62.3	63.2	26.5	32.8	28.0	1.3	0.7	1.2
Prescott Valley MSA	2,938	43,216	3.4	6,390	0.0	0.0	0.0	15.8	14.5	17.1	64.0	64.0	63.6	20.2	21.4	19.3	0.0	0.0	0.0
Sierra Vista MSA	461	5,965	0.5	1,840	0.0	0.0	0.0	17.4	11.3	17.4	58.6	57.1	58.3	24.0	31.7	24.3	0.0	0.0	0.0
Tucson CSA	9,510	133,978	11.1	21,855	2.0	1.8	2.4	25.0	21.7	28.0	26.9	26.9	29.5	44.1	48.2	38.2	1.9	1.5	1.9
Yuma MSA	807	11,283	0.9	2,943	0.5	0.1	0.5	29.3	24.2	27.1	37.1	37.3	37.6	32.6	38.3	34.4	0.5	0.1	0.4
Non-MSA AZ	918	14,587	1.1	2,025	0.7	0.5	0.5	11.7	9.9	10.5	45.9	49.0	47.8	41.8	40.5	41.2	0.0	0.0	0.0
Total	85,841	1,296,692	100.0	184,160	3.3	1.9	3.0	19.0	14.3	19.1	32.2	31.4	33.1	44.8	51.9	44.1	0.7	0.5	0.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Phoenix CSA	45,662	1,466,573	78.8	140,245	92.1	60.2	48.2	1.8	16.1	6.1	23.7
Limited-Scope:											
Flagstaff MSA	1,005	33,111	1.7	3,316	88.4	57.9	49.9	2.7	15.0	8.9	27.1
Lake Havasu MSA	970	30,342	1.7	4,347	90.1	60.6	49.8	2.5	17.6	7.4	21.8
Prescott Valley MSA	2,198	67,911	3.8	6,471	91.8	62.9	54.5	1.9	14.6	6.3	22.6
Sierra Vista MSA	376	10,839	0.6	1,831	87.3	62.2	52.3	2.2	16.5	10.6	21.3
Tucson CSA	6,619	227,264	11.4	21,981	90.0	56.3	48.0	2.3	17.6	7.6	26.0
Yuma MSA	542	13,047	0.9	2,836	86.1	60.9	46.3	3.2	15.3	10.7	23.8
Non-MSA AZ	596	19,020	1.0	1,956	84.5	59.6	49.6	3.0	16.9	12.5	23.5
Total	57,968	1,868,107	100.0	182,983	91.5	59.9	48.5	1.9	16.2	6.5	23.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022-2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Phoenix CSA	68,330	1,040,748	79.6	141,608	93.8	73.7	54.4	1.3	15.3	4.8	11.0
Limited-Scope:											
Flagstaff MSA	1,374	21,186	1.6	2,945	90.9	72.9	56.5	1.9	15.5	7.3	11.6
Lake Havasu MSA	1,503	25,729	1.8	4,554	92.3	71.2	54.0	1.8	16.4	5.9	12.4
Prescott Valley MSA	2,938	43,216	3.4	6,390	93.5	74.1	58.5	1.4	14.4	5.1	11.5
Sierra Vista MSA	461	5,965	0.5	1,840	89.8	67.0	54.6	1.7	18.0	8.5	15.0
Tucson CSA	9,510	133,978	11.1	21,855	92.5	73.8	54.8	1.7	14.4	5.8	11.7
Yuma MSA	807	11,283	0.9	2,943	89.6	75.1	52.1	2.2	16.9	8.2	8.1
Non-MSA AZ	918	14,587	1.1	2,025	88.6	73.9	56.4	2.0	15.6	9.4	10.6
Total	85,841	1,296,692	100.0	184,160	93.4	73.7	54.6	1.4	15.2	5.1	11.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix CSA	309	7,589	64.6	668	7.0	1.9	2.2	19.4	19.7	21.1	31.8	22.7	34.0	41.6	54.4	42.4	0.3	1.3	0.3
Limited-Scope:																			
Flagstaff MSA	10	123	2.1	20	0.0	0.0	0.0	13.9	10.0	5.0	29.4	10.0	40.0	56.1	80.0	55.0	0.6	0.0	0.0
Lake Havasu MSA	10	122	2.1	34	0.0	0.0	0.0	4.9	0.0	17.6	79.7	100.0	73.5	15.4	0.0	8.8	0.0	0.0	0.0
Prescott Valley MSA	27	305	5.6	88	0.0	0.0	0.0	20.7	37.0	20.5	55.1	33.3	45.5	24.2	29.6	34.1	0.0	0.0	0.0
Sierra Vista MSA	28	268	5.9	138	1.8	0.0	0.7	12.4	3.6	10.9	71.9	92.9	79.7	14.0	3.6	8.7	0.0	0.0	0.0
Tucson CSA	38	566	8.0	112	5.6	0.0	0.9	21.3	10.5	10.7	33.6	44.7	42.9	39.2	44.7	45.5	0.3	0.0	0.0
Yuma MSA	27	821	5.6	87	0.0	0.0	0.0	21.1	29.6	18.4	48.8	44.4	48.3	30.1	25.9	33.3	0.0	0.0	0.0
Non-MSA AZ	29	408	6.1	62	0.0	0.0	0.0	10.9	24.1	11.3	32.0	31.0	22.6	57.1	44.8	66.1	0.0	0.0	0.0
Total	478	10,202	100.0	1,209	5.7	1.3	1.4	19.0	19.2	17.9	35.7	32.2	42.5	39.3	46.4	38.0	0.2	0.8	0.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Phoenix CSA	507	5,828	66.7	657	4.2	2.6	2.0	21.5	12.0	19.0	32.7	34.7	34.4	40.9	50.1	43.2	0.7	0.6	1.4
Limited-Scope:																			
Flagstaff MSA	16	136	2.1	32	0.4	0.0	0.0	6.1	6.3	3.1	63.2	62.5	75.0	29.0	31.3	21.9	1.3	0.0	0.0
Lake Havasu MSA	8	77	1.1	37	0.0	0.0	0.0	10.3	12.5	21.6	69.1	87.5	62.2	19.2	0.0	13.5	1.4	0.0	2.7
Prescott Valley MSA	52	679	6.8	69	0.0	0.0	0.0	17.1	23.1	20.3	67.2	69.2	73.9	15.7	7.7	5.8	0.0	0.0	0.0
Sierra Vista MSA	24	280	3.2	116	0.0	0.0	0.0	14.3	12.5	6.9	69.2	79.2	75.9	16.3	8.3	16.4	0.1	0.0	0.9
Tucson CSA	90	957	11.8	111	2.8	0.0	0.9	27.4	22.2	27.0	28.6	13.3	18.0	40.4	63.3	53.2	0.7	1.1	0.9
Yuma MSA	35	473	4.6	64	0.3	0.0	0.0	25.8	20.0	18.8	33.2	20.0	26.6	37.7	57.1	53.1	3.0	2.9	1.6
Non-MSA AZ	28	335	3.7	64	0.0	0.0	0.0	14.0	14.3	20.3	41.2	50.0	46.9	44.8	35.7	32.8	0.0	0.0	0.0
Total	760	8,765	100.0	1,150	3.3	1.7	1.2	21.4	14.3	18.3	36.4	37.0	41.7	38.3	46.3	37.7	0.7	0.7	1.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Phoenix CSA	309	7,589	64.6	668	96.7	63.1	45.4	2.0	14.2	1.3	22.7
Limited-Scope:											
Flagstaff MSA	10	123	2.1	20	96.4	80.0	55.0	1.8	0.0	1.8	20.0
Lake Havasu MSA	10	122	2.1	34	98.4	90.0	38.2	0.9	0.0	0.7	10.0
Prescott Valley MSA	27	305	5.6	88	97.7	74.1	45.5	1.5	3.7	0.8	22.2
Sierra Vista MSA	28	268	5.9	138	97.7	60.7	29.0	1.1	14.3	1.3	25.0
Tucson CSA	38	566	7.9	112	97.1	71.1	45.5	1.8	7.9	1.1	21.1
Yuma MSA	27	821	5.6	87	86.5	44.4	43.7	8.5	37.0	5.0	18.5
Non-MSA AZ	29	408	6.1	62	96.3	69.0	43.5	2.1	6.9	1.6	24.1
Total	478	10,202	100.0	1,209	96.6	64.4	43.3	2.1	13.4	1.4	22.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Phoenix CSA	507	5,828	66.7	657	97.3	72.2	53.4	1.4	12.4	1.2	15.4
Limited-Scope:											
Flagstaff MSA	16	136	2.1	32	97.2	93.8	71.9	1.3	0.0	1.5	6.3
Lake Havasu MSA	8	77	1.1	37	98.8	87.5	40.5	0.7	12.5	0.5	0.0
Prescott Valley MSA	52	679	6.8	69	98.0	78.8	60.9	1.2	5.8	0.8	15.4
Sierra Vista MSA	24	280	3.2	116	98.3	75.0	28.4	0.4	8.3	1.3	16.7
Tucson CSA	90	957	11.8	111	97.8	68.9	54.1	1.4	10.0	0.9	21.1
Yuma MSA	35	473	4.6	64	89.7	54.3	53.1	6.2	34.3	4.1	11.4
Non-MSA AZ	28	335	3.7	64	97.9	71.4	32.8	1.1	14.3	1.1	14.3
Total	760	8,765	100.0	1,150	97.3	72.1	50.3	1.5	12.4	1.2	15.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	384	89,643	44.1	18,643	4.4	4.2	5.4	22.4	14.6	14.8	29.8	18.8	16.6	42.9	54.4	37.0	0.5	8.1	26.3
Limited-Scope:																			
Fayetteville MSA	487	134,427	55.9	34,106	0.7	3.7	5.2	15.4	9.9	13.2	46.2	18.1	17.7	37.3	63.5	41.8	0.0	4.9	22.0
Total	871	224,070	100.0	52,749	2.4	3.9	5.3	18.8	11.9	13.8	38.4	18.4	17.3	37.3	59.5	40.2	0.2	6.3	23.5
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	269	46,253	50.8	11,692	6.1	10.0	6.1	21.8	27.1	18.7	35.2	30.9	36.5	36.9	32.0	38.7	0.0	0.0	0.0
Limited-Scope:																			
Fayetteville MSA	261	87,346	49.2	21,367	1.3	1.9	1.4	16.5	11.5	12.7	47.1	44.1	46.1	34.9	42.5	39.4	0.2	0.0	0.3
Total	530	133,599	100.0	33,059	3.5	6.0	3.1	18.9	19.4	14.9	41.7	37.4	42.7	35.8	37.2	39.2	0.1	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	384	89,643	44.1	18,643	4.4	4.2	5.4	22.4	14.6	14.8	29.8	18.8	16.6	42.9	54.4	37.0	.05	8.1	26.3
Limited-Scope:																			
Fayetteville MSA	487	134,427	55.9	34,106	0.7	3.7	5.2	15.4	9.9	13.2	46.2	18.1	17.7	37.3	63.5	41.8	0.0	4.9	22.0
Total	871	224,070	100.0	52,749	2.4	3.9	5.3	18.8	11.9	13.8	38.4	18.4	17.3	37.3	59.5	40.2	0.2	6.3	23.5
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	269	46,253	50.8	11,692	25.2	13.0	6.8	15.7	30.5	18.2	18.5	17.8	18.0	40.5	36.1	33.8	0.0	2.6	23.1
Limited-Scope:																			
Fayetteville MSA	261	87,345	49.2	21,367	20.4	6.1	5.7	18.2	15.7	14.3	20.3	16.9	20.4	41.1	56.3	41.0	0.0	5.0	18.6
Total	530	133,599	100.0	33,059	22.4	9.6	6.1	17.1	23.2	15.7	19.6	17.4	19.6	40.9	46.0	38.5	0.0	3.8	20.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Little Rock MSA	999	12,190	45.8	11,746	6.5	3.3	6.2	23.1	15.7	22.1	21.4	18.0	21.8	48.7	63.0	49.6	0.3	0.0	0.2		
Limited-Scope:																					
Fayetteville MSA	1,181	13,110	54.2	12,735	1.8	0.7	1.5	16.6	14.0	15.3	44.6	37.6	44.7	37.0	47.8	38.5	0.0	0.0	0.0		
Total	2,180	25,300	100.0	24,481	4.3	1.9	3.8	20.1	14.8	18.6	32.1	28.6	33.7	43.3	54.7	43.8	0.2	0.0	0.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Little Rock MSA	2,214	28,173	41.9	10,685	7.8	4.3	8.2	22.6	15.8	22.6	29.1	24.4	29.9	40.0	55.4	39.2	0.5	0.0	0.1	
Limited-Scope:																				
Fayetteville MSA	3,068	33,989	58.1	12,284	3.4	2.3	2.8	18.2	12.0	17.3	39.6	37.4	42.1	35.9	47.1	35.2	2.8	1.2	2.6	
Total	5,282	62,162	100.0	22,969	5.7	3.2	5.4	20.5	13.6	19.7	34.1	31.9	36.4	38.0	50.6	37.0	1.6	0.7	1.4	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Little Rock MSA	999	12,190	45.8	11,746	81.4	61.3	40.0	6.1	22.7	12.5	16.0
Limited-Scope:											
Fayetteville MSA	1,181	13,110	54.2	12,735	83.0	68.7	40.5	4.5	17.7	12.5	13.6
Total	2,180	25,300	100.0	24,481	82.1	65.3	40.2	5.3	20.0	12.5	14.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Little Rock MSA	2,214	28,173	41.9	10,685	85.6	68.8	49.2	4.0	19.3	10.4	11.9
Limited-Scope:											
Fayetteville MSA	3,068	33,989	58.1	12,284	86.9	71.7	51.5	2.8	14.1	10.3	14.2
Total	5,282	62,162	100.0	22,969	86.2	70.5	50.4	3.4	16.3	10.4	13.2
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	10	95	31.3	97	3.0	0.0	4.1	18.7	10.0	15.5	28.4	10.0	42.3	49.8	80.0	38.1	0.0	0.0	0.0
Limited-Scope:																			
Fayetteville MSA	22	249	68.8	953	1.1	0.0	0.0	14.3	4.5	7.1	51.6	72.7	77.3	33.1	22.7	15.5	0.0	0.0	0.0
Total	32	344	100.0	1,050	1.9	0.0	0.4	16.3	6.3	7.9	41.1	53.1	74.1	40.6	40.6	17.6	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Little Rock MSA	17	188	20.7	92	5.7	0.0	5.4	20.8	11.8	9.8	30.2	17.6	38.0	43.2	70.6	46.7	0.1	0.0	0.0
Limited-Scope:																			
Fayetteville MSA	65	890	79.3	638	2.0	0.0	0.3	21.8	40.0	38.4	44.3	43.1	50.3	30.6	16.9	11.0	1.3	0.0	0.0
Total	82	1,078	100.0	730	3.7	0.0	1.0	21.3	34.1	34.8	38.0	37.8	48.8	36.3	28.0	15.5	0.7	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Little Rock MSA	10	95	31.3	97	96.3	100.0	62.9	1.9	0.0	1.9	0.0
Limited-Scope:											
Fayetteville MSA	22	249	68.8	953	95.8	63.6	49.2	1.7	13.6	2.5	22.7
Total	32	344	100.0	1,050	96.0	75.0	50.5	1.8	9.4	2.2	15.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Little Rock MSA	17	188	20.7	92	95.0	64.7	59.8	1.3	11.8	3.7	23.5
Limited-Scope:											
Fayetteville MSA	65	890	79.3	638	96.2	73.8	77.3	0.9	7.7	2.9	18.5
Total	82	1,078	100.0	730	95.7	72.0	75.1	1.1	8.5	3.2	19.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Fresno CSA	1,824	522,416	1.3	62,285	2.6	1.6	1.8	22.7	14.4	16.6	23.8	20.7	21.8	50.9	63.3	59.8	0.0	0.0	0.0
Los Angeles CSA	61,165	48,918,499	45.1	1,018,980	2.6	2.7	2.3	18.6	16.8	16.6	30.8	24.2	30.4	47.9	55.9	50.4	0.1	0.5	0.3
San Francisco CSA	45,288	35,618,731	33.4	616,132	3.7	3.4	3.7	17.2	14.6	16.3	37.6	32.5	36.8	41.4	49.3	43.1	0.1	0.2	0.1
Limited-Scope:																			
Bakersfield MSA	1,146	264,492	0.8	44,023	5.6	3.3	3.3	15.8	10.8	9.8	32.3	27.1	29.0	46.2	57.9	57.1	0.1	0.8	0.8
Chico MSA	309	109,891	0.2	10,159	0.9	1.9	1.5	20.3	16.2	17.7	51.6	39.5	42.2	27.2	42.4	38.7	0.0	0.0	0.0
El Centro MSA	211	42,481	0.2	6,057	0.0	0.0	0.0	33.5	18.5	21.8	25.5	17.1	20.1	40.8	64.5	58.0	0.1	0.0	0.1
Redding CSA	404	98,196	0.3	14,605	0.0	0.0	0.0	20.9	13.9	18.8	58.4	59.7	56.6	20.7	26.5	24.6	0.0	0.0	0.0
Sacramento CSA	7,708	4,293,334	5.7	196,398	4.1	4.1	4.7	17.5	11.5	16.0	34.3	26.9	31.5	44.0	57.5	47.8	0.0	0.1	0.0
Salinas MSA	1,181	753,674	0.9	18,422	0.6	0.5	0.7	15.3	10.5	14.6	33.9	24.6	35.0	50.2	64.4	49.7	0.0	0.0	0.0
San Diego MSA	13,060	8,998,646	9.6	215,863	2.8	2.9	2.8	15.1	14.1	14.2	35.5	26.0	34.0	46.6	57.0	49.0	0.0	0.0	0.0
Sam Luis Obispo MSA	1,034	505,858	0.8	20,309	0.0	0.0	0.0	9.3	11.1	10.5	71.7	66.9	71.2	18.5	21.4	18.1	0.5	0.6	0.2
Santa Barbara MSA	1,388	1,318,627	1.0	22,605	3.1	2.6	3.5	15.6	13.0	17.2	34.1	21.1	33.7	47.2	63.3	45.6	0.0	0.0	0.0
Visalia MSA	477	105,666	0.4	20,840	1.3	0.2	0.4	23.6	14.0	14.4	31.8	26.0	28.1	43.3	59.7	57.1	0.0	0.0	0.0
Non-MSA CA	499	139,585	0.4	14,168	2.9	2.6	3.1	24.1	17.0	20.1	54.9	50.1	57.0	18.2	30.3	19.8	0.0	0.0	0.0
Total	135,694	101,690,096	100.0	2,280,846	3.0	2.9	2.9	18.0	15.3	16.1	34.2	27.8	33.1	44.8	53.7	47.8	0.1	0.3	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Fresno CSA	617	218,853	1.8	31,777	4.6	3.9	3.5	18.6	22.2	16.6	28.6	24.5	27.8	48.2	49.4	51.9	0.0	0.0	0.0	
Los Angeles CSA	17,107	19,248,131	49.2	419,552	1.6	2.9	1.9	18.3	21.1	18.0	34.1	28.7	33.8	45.6	46.3	45.7	0.4	1.1	0.6	
San Francisco CSA	9,576	10,424,479	27.5	230,306	2.9	3.0	3.0	17.2	17.7	17.4	40.6	36.0	40.4	38.7	42.3	38.7	0.5	1.0	0.5	
Limited-Scope:																				
Bakersfield MSA	402	108,385	1.2	23,768	3.8	4.7	3.3	21.8	21.1	17.1	30.3	32.1	31.6	43.5	41.3	47.4	0.7	0.7	0.5	
Chico MSA	90	24,967	0.3	5,032	2.8	10.0	3.7	15.1	15.6	16.7	46.7	41.1	42.1	35.4	33.3	37.6	0.0	0.0	0.0	
El Centro MSA	53	12,175	0.2	3,048	0.9	1.9	1.1	27.2	17.0	20.0	28.7	17.0	23.8	42.0	64.2	54.7	1.1	0.0	0.5	
Redding CSA	104	29,668	0.3	6,941	0.0	0.0	0.0	25.8	19.2	23.2	49.8	59.6	52.1	24.5	21.2	24.7	0.0	0.0	0.0	
Sacramento CSA	2,188	1,641,145	6.3	85,897	3.2	4.3	3.7	17.4	17.1	17.9	38.5	25.3	34.4	40.7	53.2	43.7	0.2	0.0	0.2	
Salinas MSA	305	249,955	0.9	6,893	1.7	2.0	2.0	18.7	18.0	21.6	34.2	28.9	31.6	45.4	50.8	44.5	0.0	0.3	0.3	
San Diego MSA	3,255	3,458,061	9.4	82,558	2.4	3.2	2.4	15.8	15.2	15.6	37.2	33.0	37.6	44.4	48.1	44.1	0.2	0.4	0.2	
Sam Luis Obispo MSA	282	217,233	0.8	7,486	0.0	0.0	0.0	10.5	8.2	10.0	66.7	63.8	67.5	21.4	24.5	20.9	1.4	3.5	1.5	
Santa Barbara MSA	393	622,040	1.1	8,632	1.3	3.6	2.5	16.7	15.8	20.2	36.0	22.6	33.3	46.1	58.0	44.0	0.0	0.0	0.0	
Visalia MSA	229	56,663	0.7	11,065	0.8	0.4	0.8	25.1	21.0	19.1	33.6	31.4	31.0	40.5	47.2	49.1	0.0	0.0	0.0	
Non-MSA CA	182	52,629	0.5	7,472	1.0	1.1	1.3	26.0	17.6	25.0	54.8	57.1	52.9	18.2	24.2	20.8	0.0	0.0	0.0	
Total	34,783	36,364,384	100.0	930,427	2.3	3.0	2.5	18.0	19.1	17.7	37.0	31.4	36.1	42.4	45.6	43.3	0.4	0.9	0.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Fresno CSA	1,824	522,416	1.3	62,285	24.7	3.1	2.0	16.2	12.3	9.1	16.8	18.0	19.4	42.3	62.0	49.0	0.0	4.7	20.5	
Los Angeles CSA	61,165	48,918,499	45.1	1,018,980	23.9	2.4	3.1	16.5	8.7	8.5	17.6	15.6	17.8	42.0	59.0	51.8	0.0	14.3	18.8	
San Francisco CSA	45,288	35,618,731	33.4	616,132	23.8	3.3	4.6	16.3	10.9	12.2	18.4	17.1	20.5	41.5	61.3	50.4	0.0	7.5	12.2	
Limited-Scope:																				
Bakersfield MSA	1,146	264,492	0.8	44,023	24.8	2.5	1.8	16.4	13.6	8.5	16.1	17.4	19.2	42.7	62.4	49.4	0.0	4.1	21.1	
Chico MSA	309	109,891	0.2	10,159	22.9	4.5	3.1	16.7	10.7	11.7	19.0	24.9	20.9	41.4	53.7	49.2	0.0	6.1	15.1	
El Centro MSA	211	42,481	0.2	6,057	24.1	2.4	1.3	17.0	6.2	6.6	15.7	15.2	18.0	43.2	70.6	51.7	0.0	5.7	22.5	
Redding CSA	404	98,196	0.3	14,605	22.5	5.7	4.2	18.8	19.3	14.6	19.6	22.0	22.7	39.2	49.3	40.1	0.0	3.7	18.3	
Sacramento CSA	7,708	4,293,334	5.7	196,398	23.3	4.1	3.9	16.2	12.8	13.1	18.3	19.4	22.4	42.2	56.8	45.3	0.0	6.8	15.2	
Salinas MSA	1,181	753,674	0.9	18,422	21.6	2.5	2.3	17.9	11.0	8.1	18.7	14.6	18.6	41.9	62.8	55.9	0.0	9.1	15.1	
San Diego MSA	13,060	8,998,646	9.6	215,863	23.6	2.8	3.1	16.9	10.0	9.4	17.8	16.9	18.4	41.7	60.8	49.9	0.0	9.5	19.2	
Sam Luis Obispo MSA	1,034	505,858	0.8	20,309	21.0	4.8	3.9	18.2	14.9	12.8	20.2	19.9	22.2	40.6	54.1	45.6	0.0	6.3	15.6	
Santa Barbara MSA	1,388	1,318,627	1.0	22,605	23.4	2.4	3.4	16.8	7.1	10.9	18.2	11.4	18.7	41.6	64.1	50.1	0.0	15.1	16.9	
Visalia MSA	477	105,666	0.4	20,840	23.3	3.4	1.6	17.6	13.4	8.8	16.8	17.2	17.1	42.3	62.3	47.5	0.0	3.8	25.0	
Non-MSA CA	499	139,585	0.4	14,168	24.6	3.6	3.9	18.9	12.8	12.7	19.2	20.8	21.3	37.2	58.7	45.7	0.0	4.0	16.4	

Total	135,694	101,690,096	100.0	2,280,846	23.8	2.9	3.5	16.5	10.0	10.1	17.9	16.5	19.2	41.8	59.9	50.4	0.0	10.7	16.8
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Fresno CSA	617	218,853	1.8	31,777	23.7	6.3	2.8	16.7	13.3	9.7	17.9	22.0	20.8	41.6	50.9	48.7	0.0	7.5	18.0
Los Angeles CSA	17,107	19,248,131	49.2	419,552	23.1	3.9	4.3	16.7	8.3	8.3	18.4	12.4	17.1	41.7	46.8	51.7	0.0	28.6	18.5
San Francisco CSA	9,576	10,424,479	27.5	230,306	22.8	5.3	5.4	16.7	10.5	11.3	19.2	13.4	19.0	41.3	54.4	51.0	0.0	16.3	13.3
Limited-Scope:																			
Bakersfield MSA	402	108,385	1.2	23,768	23.5	5.7	2.5	17.1	15.7	10.0	17.5	20.6	21.1	42.0	52.0	47.7	0.0	6.0	18.8
Chico MSA	90	24,967	0.3	5,032	24.9	12.2	6.7	15.2	16.7	17.0	18.1	26.7	24.5	41.8	38.9	38.3	0.0	5.6	13.5
El Centro MSA	53	12,175	0.2	3,048	25.8	3.8	1.9	15.3	11.3	8.1	15.8	18.9	19.3	43.1	64.2	50.1	0.0	1.9	20.6
Redding CSA	104	29,668	0.3	6,941	22.7	11.5	7.8	17.7	21.2	19.0	20.1	22.1	23.9	39.5	37.5	31.8	0.0	7.7	17.4
Sacramento CSA	2,188	1,641,145	6.3	85,897	22.4	4.8	4.7	16.8	12.4	12.9	19.1	15.5	22.1	41.8	54.8	46.4	0.0	12.5	13.9
Salinas MSA	305	249,955	0.9	6,893	21.8	6.6	3.8	17.5	11.5	7.2	20.5	15.1	16.7	40.2	52.5	57.2	0.0	14.4	15.1
San Diego MSA	3,255	3,458,061	9.4	82,558	22.8	4.1	4.3	17.3	7.9	8.8	18.7	13.4	18.5	41.2	55.5	53.7	0.0	19.1	14.7
Sam Luis Obispo MSA	282	217,233	0.8	7,486	20.4	3.2	5.3	17.5	12.8	11.7	22.5	11.7	20.6	39.6	56.7	49.5	0.0	15.6	12.8
Santa Barbara MSA	393	622,040	1.1	8,632	22.0	3.3	4.3	18.1	3.6	10.8	18.4	12.0	18.0	41.5	57.3	50.9	0.0	23.9	16.1
Visalia MSA	229	56,663	0.7	11,065	22.9	3.9	2.5	17.2	12.7	9.9	17.3	23.1	21.0	42.7	52.4	45.6	0.0	7.9	21.0
Non-MSA CA	182	52,629	0.5	7,472	24.1	8.8	6.0	18.5	14.8	15.8	19.4	18.1	23.0	38.1	52.7	42.3	0.0	5.5	12.9
Total	34,783	36,364,384	100.0	930,427	23.0	4.5	4.5	16.8	9.5	9.9	18.7	13.4	18.6	41.5	50.7	50.7	0.0	22.0	16.3
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Fresno CSA	4,304	108,987	1.2	29,297	5.3	3.4	4.0	26.7	17.0	22.4	22.3	19.1	24.5	44.6	59.8	48.3	1.1	0.7	0.8	
Los Angeles CSA	197,850	5,422,611	55.1	765,991	4.8	3.7	4.6	20.2	17.6	20.6	26.9	26.6	27.6	46.6	50.8	46.0	1.5	1.2	1.2	
San Francisco CSA	87,799	2,060,605	24.5	319,975	8.5	6.6	8.0	19.1	16.7	19.4	32.9	33.8	34.1	39.1	42.5	38.2	0.5	0.4	0.3	
Limited-Scope:																				
Bakersfield MSA	2,965	82,606	0.8	19,566	5.4	3.6	4.2	19.7	14.1	17.2	26.7	21.2	25.4	47.4	60.6	52.3	0.8	0.4	0.9	
Chico MSA	857	20,168	0.2	4,759	1.5	0.9	1.1	27.4	23.7	25.6	43.6	37.9	39.6	27.4	37.5	33.7	0.0	0.0	0.0	
El Centro MSA	381	11,188	0.1	3,001	0.0	0.0	0.0	40.0	28.6	35.4	27.7	24.1	28.3	32.0	47.2	36.3	0.2	0.0	0.1	
Redding CSA	1,114	18,020	0.3	5,337	0.0	0.0	0.0	23.5	16.6	20.6	61.2	61.2	61.9	15.3	22.2	17.5	0.0	0.0	0.0	
Sacramento CSA	18,731	401,953	5.2	77,767	8.5	6.7	7.8	22.5	17.3	19.8	29.6	27.6	29.6	37.8	47.5	42.0	1.6	0.9	0.9	
Salinas MSA	2,204	58,544	0.6	9,126	3.7	2.3	2.8	13.3	10.8	13.3	31.7	24.7	32.7	50.7	61.8	50.8	0.5	0.4	0.4	
San Diego MSA	34,731	929,774	9.7	118,477	5.6	4.2	5.2	14.7	12.1	14.3	34.7	32.7	34.6	44.9	51.0	45.9	0.1	0.1	0.1	
Sam Luis Obispo MSA	2,484	67,813	0.7	10,600	0.0	0.0	0.0	20.4	17.5	18.9	58.9	61.4	60.6	19.8	20.8	19.9	0.8	0.4	0.5	
Santa Barbara MSA	3,120	73,862	0.9	14,074	5.1	2.9	3.7	28.9	27.6	29.7	25.0	22.6	25.5	40.5	46.3	40.6	0.5	0.6	0.4	
Visalia MSA	1,000	23,304	0.3	8,273	1.0	0.2	0.9	28.3	19.1	26.9	29.2	23.8	29.6	41.5	56.9	42.5	0.0	0.0	0.0	
Non-MSA CA	1,433	24,859	0.4	6,439	3.7	4.7	4.7	29.5	23.7	27.2	52.3	53.9	54.1	14.5	17.7	14.0	0.0	0.0	0.0	
Total	358,973	9,304,294	100.0	1,392,682	5.9	4.6	5.4	19.9	16.9	19.8	29.9	29.3	30.3	43.3	48.4	43.6	1.1	0.8	0.8	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Fresno CSA	7,262	95,982	1.2	28,872	7.2	3.9	5.5	22.0	13.8	20.6	28.9	23.9	27.7	41.1	57.9	45.5	0.8	0.6	0.6
Los Angeles CSA	317,969	4,825,484	52.5	732,869	3.3	2.3	3.1	19.4	16.5	20.1	30.0	30.2	30.9	45.2	49.6	44.1	2.2	1.5	1.8
San Francisco CSA	168,012	2,067,288	27.7	297,229	5.5	3.4	5.3	18.1	16.2	18.6	36.0	37.1	37.2	37.3	41.6	36.7	3.2	1.7	2.2
Limited-Scope:																			
Bakersfield MSA	4,603	71,841	0.8	20,063	5.3	3.2	4.1	20.5	14.5	17.8	27.9	25.9	29.0	40.9	53.0	45.0	5.4	3.5	4.1
Chico MSA	1,428	17,857	0.2	4,507	6.6	4.1	5.0	20.2	18.8	19.7	39.2	31.2	36.6	34.0	45.9	38.7	0.0	0.0	0.0
El Centro MSA	524	8,789	0.1	3,116	1.1	1.3	1.0	28.2	23.3	25.5	28.1	21.6	28.2	40.4	51.5	43.5	2.2	2.3	1.8
Redding CSA	1,753	24,033	0.3	5,254	0.0	0.0	0.0	18.4	16.4	22.9	66.3	57.2	54.7	15.3	26.5	22.4	0.0	0.0	0.0
Sacramento CSA	35,740	444,224	5.9	75,786	7.2	4.9	6.7	26.4	17.6	18.8	30.9	28.9	33.0	34.0	47.9	40.6	1.4	0.7	0.9
Salinas MSA	3,318	44,931	0.5	9,106	2.3	1.3	2.2	18.6	14.3	19.0	32.0	31.9	34.9	46.6	52.0	43.6	0.5	0.4	0.4
San Diego MSA	53,203	757,409	8.8	113,825	3.8	2.5	3.4	17.4	13.3	16.7	34.2	32.4	34.2	43.7	51.2	44.9	0.9	0.5	0.7
Sam Luis Obispo MSA	3,653	53,526	0.6	9,426	0.0	0.0	0.0	12.8	9.3	13.3	60.9	64.8	62.6	24.5	24.7	22.6	1.8	1.2	1.4
Santa Barbara MSA	4,668	62,839	0.8	12,200	3.1	1.7	2.3	18.9	14.8	18.7	27.8	27.2	28.9	49.7	55.9	49.6	0.6	0.4	0.5
Visalia MSA	1,660	23,135	0.3	8,246	2.6	1.4	1.8	24.5	17.0	24.7	31.7	25.3	32.0	41.2	56.2	41.5	0.0	0.0	0.0
Non-MSA CA	2,295	27,351	0.4	6,198	2.7	3.1	2.4	32.6	26.8	30.2	52.9	57.8	54.9	11.8	12.4	12.6	0.0	0.0	0.0
Total	606,088	8,524,689	100.0	1,326,697	4.2	2.8	3.8	19.5	16.1	19.4	32.4	32.5	33.1	41.8	47.3	42.0	2.2	1.4	1.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Fresno CSA	4,304	108,987	1.2	29,297	87.3	62.3	41.1	3.9	15.8	8.8	21.9
Los Angeles CSA	197,850	5,422,611	55.1	765,991	90.3	61.5	45.5	3.8	15.0	6.0	23.5
San Francisco CSA	87,799	2,060,605	24.5	319,975	88.6	63.7	47.7	4.2	14.1	7.2	22.2
Limited-Scope:											
Bakersfield MSA	2,965	82,606	0.8	19,566	87.6	60.5	41.1	3.6	16.6	8.8	22.9
Chico MSA	857	20,168	0.2	4,759	87.2	54.6	49.8	3.8	20.5	9.1	24.9
El Centro MSA	381	11,188	0.1	3,001	79.1	49.9	40.6	5.0	18.9	15.9	31.2
Redding CSA	1,114	18,020	0.3	5,337	87.6	65.7	51.6	3.6	18.1	8.8	16.2
Sacramento CSA	18,731	401,953	5.2	77,767	88.9	65.0	48.1	3.3	14.4	7.8	20.6
Salinas MSA	2,204	58,544	0.6	9,126	87.4	59.5	46.3	4.0	15.8	8.6	24.7
San Diego MSA	34,731	929,774	9.7	118,477	90.1	62.5	46.4	3.7	14.3	6.3	23.3
Sam Luis Obispo MSA	2,484	67,813	0.7	10,600	89.1	59.9	41.9	3.6	16.0	7.3	24.1
Santa Barbara MSA	3,120	73,862	0.9	14,074	87.7	59.3	43.9	4.3	16.0	8.1	24.7
Visalia MSA	1,000	23,304	0.3	8,273	84.5	60.7	46.7	4.4	17.7	11.1	21.6
Non-MSA CA	1,433	24,859	0.4	6,439	84.7	64.1	45.5	4.1	15.7	11.1	20.2
Total	358,973	9,304,294	100.0	1,392,682	89.5	62.3	46.1	3.9	14.7	6.7	23.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Fresno CSA	7,262	95,982	1.2	28,872	90.2	74.9	49.0	2.8	16.7	7.0	8.4
Los Angeles CSA	317,969	4,825,484	52.5	732,869	92.1	76.8	52.1	2.9	15.1	5.0	8.1
San Francisco CSA	168,012	2,067,288	27.7	297,229	90.5	76.3	54.6	3.4	12.5	6.2	11.2
Limited-Scope:											
Bakersfield MSA	4,603	71,841	0.8	20,063	89.8	74.7	47.9	2.8	17.4	7.4	7.9
Chico MSA	1,428	17,857	0.2	4,507	88.6	69.8	57.5	3.1	18.2	8.2	12.0
El Centro MSA	524	8,789	0.1	3,116	82.7	69.8	53.0	4.0	20.6	13.3	9.5
Redding CSA	1,753	24,033	0.3	5,254	90.6	68.2	54.1	2.6	22.4	6.8	9.4
Sacramento CSA	35,740	444,224	5.9	75,786	91.6	76.2	55.2	2.4	13.7	6.0	10.1
Salinas MSA	3,318	44,931	0.5	9,106	88.9	70.5	54.7	3.4	18.5	7.7	11.0
San Diego MSA	53,203	757,409	8.8	113,825	91.8	76.1	52.3	2.8	13.3	5.3	10.7
Sam Luis Obispo MSA	3,653	53,526	0.6	9,426	90.5	73.8	53.7	3.0	14.6	6.5	11.5
Santa Barbara MSA	4,668	62,839	0.8	12,200	90.1	70.3	50.2	3.3	16.8	6.6	12.9
Visalia MSA	1,660	23,135	0.3	8,246	87.0	75.6	55.0	3.5	16.3	9.5	8.1
Non-MSA CA	2,295	27,351	0.4	6,198	86.5	72.4	54.2	3.5	15.6	10.0	12.1
Total	606,088	8,524,689	100.0	1,326,697	91.4	76.4	52.8	3.0	14.2	5.6	9.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Fresno CSA	237	4,445	8.5	961	3.1	0.0	2.0	23.2	19.8	20.3	30.2	37.1	35.6	43.3	43.0	42.1	0.1	0.0	0.0
Los Angeles CSA	661	10,595	23.8	1,350	3.8	2.7	3.2	20.4	14.4	19.6	31.1	29.7	32.1	44.0	52.6	44.3	0.6	0.6	0.7
San Francisco CSA	807	11,857	29.0	2,643	4.4	1.7	1.7	17.6	11.9	13.9	39.9	42.8	41.7	38.0	43.6	42.6	0.1	0.0	0.0
Limited-Scope:																			
Bakersfield MSA	83	3,340	3.0	250	4.2	1.2	2.8	20.1	16.9	18.0	33.0	21.7	37.6	40.9	60.2	40.4	2.0	0.0	1.2
Chico MSA	44	664	1.6	212	0.8	0.0	0.9	17.9	27.3	18.4	40.3	47.7	47.6	40.9	25.0	33.0	0.0	0.0	0.0
El Centro MSA	25	447	0.9	95	0.0	0.0	0.0	23.6	24.0	28.4	26.5	20.0	23.2	49.2	56.0	47.4	0.7	0.0	1.1
Redding CSA	25	222	0.9	157	0.0	0.0	0.0	24.4	28.0	26.1	64.5	64.0	65.0	11.1	8.0	8.9	0.0	0.0	0.0
Sacramento CSA	237	3,335	8.5	867	4.3	0.8	1.3	16.4	10.5	6.9	34.0	32.9	37.4	44.9	55.7	52.7	0.4	0.0	1.7
Salinas MSA	65	2,139	2.3	186	1.8	0.0	1.1	16.4	6.2	15.1	41.3	66.2	50.5	40.1	27.7	32.8	0.4	0.0	0.5
San Diego MSA	232	3,659	8.3	385	4.1	2.6	1.6	17.2	8.2	13.8	37.6	36.2	37.4	41.1	53.0	46.8	0.0	0.0	0.5
Sam Luis Obispo MSA	99	1,112	3.6	233	0.0	0.0	0.0	9.5	4.0	2.6	70.7	71.7	73.0	18.4	21.2	23.6	1.4	3.0	0.9
Santa Barbara MSA	62	1,028	2.2	214	4.2	0.0	7.5	18.1	6.5	12.2	25.0	41.9	44.4	52.4	51.6	35.5	0.3	0.0	0.5
Visalia MSA	116	1,313	4.2	439	0.9	0.0	1.6	36.0	25.0	33.0	27.0	41.4	30.3	36.1	33.6	35.1	0.0	0.0	0.0
Non-MSA CA	90	1,313	3.2	278	1.2	2.2	0.4	30.1	27.8	22.7	54.1	51.1	62.6	14.5	18.9	14.4	0.0	0.0	0.0
Total	2,783	45,469	100.0	8,270	3.7	1.5	1.9	19.6	13.9	16.5	36.2	39.0	40.3	40.2	45.3	40.9	0.4	0.3	0.4

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Fresno CSA	414	5,663	8.6	797	4.2	1.9	3.0	19.1	13.3	20.5	34.3	30.9	36.3	42.2	53.9	40.3	0.1	0.0	0.0	
Los Angeles CSA	1,082	13,664	22.5	1,202	2.9	0.7	2.2	19.2	17.4	19.1	32.9	29.6	30.3	43.9	51.4	47.4	1.1	0.9	1.1	
San Francisco CSA	1,467	17,419	30.6	2,493	3.7	1.5	1.8	17.2	14.2	13.9	41.5	40.4	43.6	36.2	42.6	39.1	1.5	1.4	1.6	
Limited-Scope:																				
Bakersfield MSA	142	2,660	3.0	270	4.1	1.4	1.9	28.8	30.3	33.3	28.5	16.9	22.6	36.7	47.2	40.4	1.9	4.2	1.9	
Chico MSA	98	1,221	2.0	176	2.4	1.0	1.7	12.2	10.2	9.1	41.1	34.7	49.4	44.3	54.1	39.8	0.0	0.0	0.0	
El Centro MSA	40	1,213	0.8	113	2.2	0.0	0.0	17.8	12.5	19.5	24.5	15.0	15.0	54.2	72.5	64.6	1.3	0.0	0.9	
Redding CSA	53	644	1.1	160	0.0	0.0	0.0	28.4	35.8	32.5	53.5	41.5	45.6	18.1	22.6	21.9	0.0	0.0	0.0	
Sacramento CSA	481	5,263	10.0	849	4.0	0.8	0.9	18.2	10.0	9.1	38.1	37.8	41.2	39.0	51.4	47.8	0.7	0.0	0.9	
Salinas MSA	105	1,399	2.2	217	2.1	4.8	3.2	19.3	22.9	24.4	41.0	48.6	48.4	37.3	23.8	24.0	0.2	0.0	0.0	
San Diego MSA	372	4,501	7.7	397	3.4	1.3	1.0	17.8	9.9	12.8	38.6	38.4	37.3	40.0	50.3	48.6	0.2	0.0	0.3	
Sam Luis Obispo MSA	131	1,644	2.7	219	0.0	0.0	0.0	11.9	13.0	15.1	59.7	53.4	49.3	26.2	32.8	33.8	2.2	0.8	1.8	
Santa Barbara MSA	97	1,475	2.0	189	2.2	0.0	5.8	15.6	9.3	22.8	30.9	33.0	31.2	51.1	56.7	39.2	0.3	1.0	1.1	
Visalia MSA	192	2,796	4.0	483	0.9	1.0	1.0	22.3	16.7	21.5	37.9	41.7	45.1	38.9	40.6	32.3	0.0	0.0	0.0	
Non-MSA CA	128	1,695	2.7	246	1.7	0.0	0.0	31.8	34.4	35.4	56.6	54.7	57.7	9.9	10.9	6.9	0.0	0.0	0.0	
Total	4,802	61,257	100.0	7,811	3.1	1.2	1.8	19.0	15.4	17.5	37.8	36.5	39.8	39.2	46.1	40.0	1.0	0.8	0.9	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Fresno CSA	237	4,445	8.5	961	91.1	57.0	50.6	6.9	23.6	2.0	19.4
Los Angeles CSA	661	10,595	23.8	1,350	94.6	62.0	58.3	3.1	16.0	2.4	21.9
San Francisco CSA	807	11,857	29.0	2,643	93.9	62.1	56.9	4.1	19.1	2.0	18.8
Limited-Scope:											
Bakersfield MSA	83	3,340	3.0	250	89.1	37.3	43.6	8.0	41.0	2.9	21.7
Chico MSA	44	664	1.6	212	94.6	72.7	57.5	4.3	13.6	1.1	13.6
El Centro MSA	25	447	0.9	95	81.0	36.0	25.3	15.9	60.0	3.2	4.0
Redding CSA	25	222	0.9	157	95.3	68.0	55.4	2.3	8.0	2.4	24.0
Sacramento CSA	237	3,335	8.5	867	95.2	66.2	60.0	3.0	13.1	1.9	20.7
Salinas MSA	65	2,139	2.3	186	85.9	36.9	46.2	9.9	43.1	4.2	20.0
San Diego MSA	232	3,659	8.3	385	95.4	71.6	67.0	2.8	12.9	1.8	15.5
Sam Luis Obispo MSA	99	1,112	3.6	233	95.6	69.7	57.9	2.8	13.1	1.6	17.2
Santa Barbara MSA	62	1,028	2.2	214	92.5	53.2	41.6	5.2	22.6	2.3	24.2
Visalia MSA	116	1,313	4.2	439	88.1	61.2	49.7	9.8	25.0	2.1	13.8
Non-MSA CA	90	1,313	3.2	278	96.9	65.6	56.5	1.7	13.3	1.4	21.1
Total	2,783	45,469	100.0	8,270	93.8	61.6	55.4	4.1	19.0	2.1	19.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Fresno CSA	414	5,663	8.6	797	93.2	62.8	52.9	5.1	26.1	1.7	11.1
Los Angeles CSA	1,082	13,664	22.5	1,202	95.7	65.7	62.2	2.3	20.1	2.0	14.1
San Francisco CSA	1,467	17,419	30.5	2,493	94.8	66.5	56.7	3.3	20.9	1.9	12.5
Limited-Scope:											
Bakersfield MSA	142	2,660	3.0	270	90.9	55.6	43.3	6.3	34.5	2.7	9.9
Chico MSA	98	1,221	2.0	176	95.5	71.4	65.3	3.4	17.3	1.0	11.2
El Centro MSA	40	1,213	0.8	113	82.9	42.5	35.4	13.5	52.5	3.5	5.0
Redding CSA	53	644	1.1	160	96.0	86.8	54.4	2.1	5.7	1.9	7.5
Sacramento CSA	481	5,263	10.0	849	96.2	70.7	61.5	2.3	13.3	1.6	16.0
Salinas MSA	105	1,399	2.2	217	88.4	61.9	53.0	8.0	34.3	3.6	3.8
San Diego MSA	372	4,501	7.7	397	96.2	75.8	64.7	2.1	10.8	1.6	13.4
Sam Luis Obispo MSA	131	1,644	2.7	219	96.4	69.5	53.9	2.2	11.5	1.4	19.1
Santa Barbara MSA	97	1,475	2.0	189	93.9	64.9	45.0	4.0	21.6	2.2	13.4
Visalia MSA	192	2,796	4.0	483	90.5	47.4	47.0	7.8	40.6	1.7	12.0
Non-MSA CA	128	1,695	2.7	246	97.5	83.6	62.6	1.2	8.6	1.2	7.8
Total	4,802	61,257	100.0	7,811	94.9	66.6	56.6	3.2	20.6	1.9	12.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Denver CSA	22,889	10,517,103	83.6	340,446	4.3	4.2	4.0	18.7	18.8	17.2	36.0	29.9	34.8	40.9	47.2	44.0	0.0	0.0	0.0
Limited-Scope:																			
Colorado Springs MSA	1,859	649,518	6.8	71,262	3.3	1.5	2.3	20.7	14.2	17.3	42.2	37.1	43.6	33.8	47.3	36.8	0.0	0.0	0.0
Fort Collins MSA	1,728	599,472	6.3	32,434	1.5	0.8	1.8	20.5	17.5	20.0	52.7	44.3	46.8	25.2	37.4	31.4	0.0	0.0	0.0
Non-MSA CO	900	1,670,143	3.3	12,587	0.0	0.0	0.0	0.0	0.0	0.0	31.9	22.8	31.3	68.1	77.2	68.7	0.0	0.0	0.0
Total	27,376	13,436,236	100.0	456,729	3.8	3.6	3.5	18.6	17.8	17.0	38.0	31.1	36.9	39.5	47.5	42.7	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Denver CSA	4,837	3,228,849	80.5	162,821	2.6	2.6	2.4	20.2	17.3	19.3	39.1	32.6	37.7	37.6	46.7	40.1	0.5	0.8	0.5
Limited-Scope:																			
Colorado Springs MSA	473	190,142	7.9	37,463	1.3	1.1	1.6	19.7	20.3	17.8	41.9	35.3	39.2	37.0	43.3	41.2	0.3	0.0	0.2
Fort Collins MSA	404	180,977	6.7	15,808	0.3	0.0	0.5	14.8	13.4	12.8	64.3	61.1	62.3	20.5	25.5	24.3	0.1	0.0	0.0
Non-MSA CO	298	873,086	5.0	6,164	0.0	0.0	0.0	1.1	1.0	1.9	39.1	28.5	38.6	59.7	70.5	59.5	0.0	0.0	0.0
Total	6,012	4,473,053	100.0	222,256	2.2	2.2	2.0	19.2	16.5	18.1	41.4	34.5	39.8	36.9	46.2	39.7	0.4	0.7	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Denver CSA	22,889	10,517,103	83.6	340,446	21.3	7.1	7.6	17.5	22.8	18.4	20.5	21.5	22.5	40.7	44.6	33.9	0.0	3.9	17.5	
Limited-Scope:																				
Colorado Springs MSA	1,859	649,518	6.8	71,262	20.4	4.0	4.1	18.5	17.9	14.5	20.3	24.6	20.7	40.8	51.0	32.8	0.0	2.5	27.8	
Fort Collins MSA	1,728	599,472	6.3	32,434	20.5	8.8	6.6	17.2	21.2	17.7	22.6	24.5	22.5	39.6	41.6	34.9	0.0	3.9	18.3	
Non-MSA CO	900	1,670,143	3.3	12,587	13.8	0.4	2.1	14.8	4.3	7.7	18.1	11.6	16.6	53.3	57.6	56.3	0.0	26.1	17.3	
Total	27,376	13,436,236	100.0	456,729	20.9	6.8	6.8	17.6	21.8	17.5	20.5	21.6	22.1	41.0	45.3	34.5	0.0	4.6	19.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Denver CSA	4,837	3,228,849	80.5	162,821	20.2	8.1	7.3	18.1	17.3	18.1	21.9	17.2	23.3	39.8	48.1	37.1	0.0	9.3	14.2
Limited-Scope:																			
Colorado Springs MSA	473	190,142	7.9	37,463	18.9	8.9	5.3	18.6	23.5	17.6	21.9	20.5	25.4	40.6	44.4	36.5	0.0	2.7	15.3
Fort Collins MSA	404	180,977	6.7	15,808	19.2	9.4	7.1	18.3	15.1	16.9	23.6	26.7	23.1	38.9	45.5	38.2	0.0	3.2	14.7
Non-MSA CO	298	873,086	5.0	6,164	12.1	0.3	2.6	13.1	2.3	7.1	21.3	8.1	13.8	53.5	50.7	58.0	0.0	38.6	18.5
Total	6,012	4,473,053	100.0	222,256	19.7	7.8	6.8	18.1	16.9	17.6	22.0	17.7	23.4	40.2	47.7	37.6	0.0	9.8	14.5
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Denver CSA	41,901	986,512	81.5	127,385	6.4	6.1	6.9	19.7	16.8	19.5	33.2	31.4	32.6	40.5	45.5	40.8	0.3	0.2	0.2		
Limited-Scope:																					
Colorado Springs MSA	4,363	91,582	8.5	17,565	6.9	6.7	7.4	23.2	19.1	22.6	34.1	28.0	32.5	35.7	46.1	37.4	0.1	0.0	0.0		
Fort Collins MSA	3,723	81,270	7.2	12,421	3.1	4.1	4.7	26.8	25.4	26.6	42.2	37.4	40.0	27.9	33.1	28.8	0.0	0.0	0.0		
Non-MSA CO	1,437	23,608	2.8	8,743	0.0	0.0	0.0	0.0	0.0	0.0	31.7	22.1	32.1	68.3	77.9	67.9	0.0	0.0	0.0		
Total	51,424	1,182,972	100.0	166,114	6.0	5.8	6.4	20.0	17.2	19.3	33.9	31.3	33.1	39.8	45.6	41.0	0.2	0.2	0.2		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Denver CSA	67,592	924,685	80.5	120,470	3.7	2.9	4.1	22.8	16.4	21.5	33.5	33.3	33.9	37.0	45.5	38.0	3.0	2.0	2.4		
Limited-Scope:																					
Colorado Springs MSA	7,549	96,639	9.0	18,869	1.4	0.6	1.1	26.6	18.5	25.8	36.1	28.8	34.5	35.3	51.7	38.0	0.6	0.4	0.6		
Fort Collins MSA	6,017	83,584	7.2	11,166	0.5	0.4	0.4	15.1	13.5	15.3	64.8	60.6	62.6	19.5	25.5	21.7	0.0	0.0	0.0		
Non-MSA CO	2,789	39,908	3.3	7,874	0.0	0.0	0.0	1.9	1.4	3.0	27.4	22.9	30.4	70.7	75.7	66.7	0.0	0.0	0.0		
Total	83,947	1,144,816	100.0	158,379	3.0	2.4	3.3	22.0	15.8	20.7	35.8	34.5	35.8	36.8	45.6	38.3	2.4	1.7	1.9		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Denver CSA	41,901	986,512	81.5	127,385	92.5	64.2	47.8	2.4	14.9	5.2	20.9
Limited-Scope:											
Colorado Springs MSA	4,363	91,582	8.5	17,565	92.6	68.2	54.4	1.9	13.1	5.5	18.7
Fort Collins MSA	3,723	81,270	7.2	12,421	92.6	64.1	48.0	2.0	16.0	5.4	19.9
Non-MSA CO	1,437	23,608	2.8	8,743	90.4	65.2	47.2	3.2	19.4	6.4	15.4
Total	51,424	1,182,972	100.0	166,114	92.4	64.6	48.4	2.3	14.9	5.3	20.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Denver CSA	67,592	924,685	80.5	120,470	94.3	72.7	54.5	1.6	15.3	4.1	12.1
Limited-Scope:											
Colorado Springs MSA	7,549	96,639	9.0	18,869	94.6	75.6	60.1	1.2	13.0	4.2	11.4
Fort Collins MSA	6,017	83,584	7.2	11,166	94.0	71.7	56.3	1.4	16.2	4.6	12.0
Non-MSA CO	2,789	39,908	3.3	7,874	92.7	67.0	49.1	1.8	21.0	5.5	11.9
Total	83,947	1,144,816	100.0	158,379	94.3	72.7	55.0	1.5	15.3	4.2	12.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Denver CSA	330	4,162	73.7	1,064	6.3	2.1	1.8	19.1	5.5	8.4	36.4	43.3	53.0	37.9	48.2	36.6	0.2	0.9	0.3	
Limited-Scope:																				
Colorado Springs MSA	36	287	8.0	97	6.9	2.8	3.1	20.9	0.0	7.2	42.2	30.6	49.5	30.0	66.7	40.2	0.0	0.0	0.0	
Fort Collins MSA	60	738	13.4	160	4.1	8.3	1.3	18.8	5.0	10.6	46.0	40.0	48.1	31.1	46.7	40.0	0.1	0.0	0.0	
Non-MSA CO	22	308	4.9	93	0.0	0.0	0.0	0.0	0.0	0.0	39.5	18.2	38.7	60.5	81.8	61.3	0.0	0.0	0.0	
Total	448	5,495	100.0	1,414	5.9	2.9	1.7	18.4	4.7	8.0	38.3	40.6	51.3	37.2	51.1	38.8	0.2	0.7	0.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Denver CSA	571	6,555	72.2	936	3.4	1.4	1.9	21.8	10.2	9.0	39.7	46.1	57.1	33.7	41.7	30.9	1.4	0.7	1.2
Limited-Scope:																			
Colorado Springs MSA	64	666	8.1	111	0.8	0.0	0.0	23.8	18.8	12.6	42.9	28.1	40.5	31.8	53.1	45.9	0.7	0.0	0.9
Fort Collins MSA	122	1,196	15.4	159	0.4	0.0	0.0	13.0	11.5	6.3	62.4	59.0	67.9	24.1	29.5	25.8	0.0	0.0	0.0
Non-MSA CO	34	340	4.3	83	0.0	0.0	0.0	0.9	0.0	0.0	33.3	35.3	53.0	65.8	64.7	47.0	0.0	0.0	0.0
Total	791	8,757	100.0	1,289	2.6	1.0	1.4	20.1	10.6	8.4	42.2	46.1	56.7	34.1	41.7	32.6	1.1	0.5	0.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Denver CSA	330	4,162	73.7	1,064	96.6	71.5	59.0	1.7	11.8	1.6	16.7
Limited-Scope:											
Colorado Springs MSA	36	287	8.0	97	97.4	63.9	60.8	1.2	19.4	1.4	16.7
Fort Collins MSA	60	738	13.4	160	97.5	70.0	58.1	1.3	13.3	1.2	16.7
Non-MSA CO	22	308	4.9	93	95.7	63.6	75.3	2.5	4.5	1.8	31.8
Total	448	5,495	100.0	1,414	96.8	70.3	60.1	1.7	12.3	1.5	17.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Denver CSA	571	6,555	72.2	936	97.4	72.9	62.3	1.1	12.8	1.4	14.4
Limited-Scope:											
Colorado Springs MSA	64	666	8.1	111	98.2	70.3	76.6	0.7	10.9	1.1	18.8
Fort Collins MSA	122	1,196	15.4	159	97.8	82.0	69.2	1.0	4.1	1.2	13.9
Non-MSA CO	34	340	4.3	83	96.1	58.8	72.3	1.1	14.7	2.8	26.5
Total	791	8,757	100.0	1,289	97.5	73.5	65.0	1.1	11.4	1.4	15.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Hartford MSA	1,384	362,456	100.0	49,971	4.2	2.1	4.7	12.5	7.4	11.6	42.0	33.7	39.8	41.3	56.7	43.8	0.0	0.1	0.0	
Total	1,384	362,456	100.0	49,971	4.2	2.1	4.7	12.5	7.4	11.6	42.0	33.7	39.8	41.3	56.7	43.8	0.0	0.1	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Hartford MSA	713	179,735	100.0	29,127	3.5	6.9	5.0	13.5	16.8	14.8	45.8	42.8	43.5	37.3	33.5	36.7	0.0	0.0	0.0	
Total	713	179,735	100.0	29,127	3.5	6.9	5.0	13.5	16.8	14.8	45.8	42.8	43.5	37.3	33.5	36.7	0.0	0.0	0.0	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Hartford MSA	1,384	362,456	100.0	49,971	23.2	6.4	10.3	16.7	21.5	23.1	20.8	25.0	22.1	39.3	43.9	28.7	0.0	3.1	15.8
Total	1,384	362,456	100.0	49,971	23.2	6.4	10.3	16.7	21.5	23.1	20.8	25.0	22.1	39.3	43.9	28.7	0.0	3.1	15.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Hartford MSA	713	179,735	100.0	29,127	23.1	14.3	11.8	16.8	34.9	26.4	20.8	22.2	22.5	39.3	25.0	26.5	0.0	3.6	12.8
Total	713	179,735	100.0	29,127	23.1	14.3	11.8	16.8	34.9	26.4	20.8	22.2	22.5	39.3	25.0	26.5	0.0	3.6	12.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Hartford MSA	2,941	33,438	100.0	32,010	11.6	4.7	9.8	14.7	11.7	14.8	38.7	41.1	40.6	34.6	42.5	34.5	0.4	0.1	0.2	
Total	2,941	33,438	100.0	32,010	11.6	4.7	9.8	14.7	11.7	14.8	38.7	41.1	40.6	34.6	42.5	34.5	0.4	0.1	0.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Hartford MSA	6,578	74,790	100.0	27,579	10.4	5.0	7.7	16.6	11.2	16.4	43.5	43.7	45.8	29.1	40.0	29.9	0.3	0.1	0.2	
Total	6,578	74,790	100.0	27,579	10.4	5.0	7.7	16.6	11.2	16.4	43.5	43.7	45.8	29.1	40.0	29.9	0.3	0.1	0.2	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Hartford MSA	2,941	33,438	100.0	32,010	87.7	66.9	44.9	3.8	18.2	8.5	14.9
Total	2,941	33,438	100.0	32,010	87.7	66.9	44.9	3.8	18.2	8.5	14.9
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Hartford MSA	6,578	74,790	100.0	27,579	90.1	74.4	51.4	2.9	13.6	7.0	12.0
Total	6,578	74,790	100.0	27,579	90.1	74.4	51.4	2.9	13.6	7.0	12.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Hartford MSA	32	327	100.0	127	4.8	0.0	1.6	10.5	0.0	3.2	39.8	28.1	29.9	44.9	71.9	65.4	0.0	0.0	0.0
Total	32	327	100.0	127	4.8	0.0	1.6	10.5	0.0	3.2	39.8	28.1	29.9	44.9	71.9	65.4	0.0	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Hartford MSA	58	665	100.0	126	5.2	0.0	1.6	11.4	1.7	5.6	43.8	39.7	44.4	39.6	58.6	48.4	0.0	0.0	0.0		
Total	58	665	100.0	126	5.2	0.0	1.6	11.4	1.7	5.6	43.8	39.7	44.4	39.6	58.6	48.4	0.0	0.0	0.0		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Hartford MSA	32	327	100.0	127	96.8	62.5	62.2	1.9	21.9	1.4	15.6
Total	32	327	100.0	127	96.8	62.5	62.2	1.9	21.9	1.4	15.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Hartford MSA	58	665	100.0	126	97.2	81.0	68.3	1.4	12.1	1.3	6.9
Total	58	665	100.0	126	97.2	81.0	68.3	1.4	12.1	1.3	6.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Miami CSA	14,726	8,050,698	36.7	305,021	2.5	1.4	1.9	22.0	16.2	17.8	35.4	28.6	36.2	40.0	53.4	43.8	0.1	0.5	0.3	
Tampa MSA	6,944	2,094,478	17.3	190,203	1.9	1.5	1.8	21.9	14.7	17.5	39.7	31.1	37.5	36.5	52.5	43.2	0.1	0.1	0.0	
Limited-Scope:																				
Cape Coral CSA	3,035	1,341,803	7.6	82,888	2.1	0.6	1.4	17.8	13.0	17.8	43.2	37.0	43.9	36.9	49.1	36.9	0.0	0.3	0.0	
Gainesville MSA	295	64,341	0.7	10,855	2.4	3.1	2.6	14.9	8.5	9.8	37.5	31.2	38.6	44.6	56.3	47.9	0.6	1.0	1.0	
Jacksonville MSA	2,356	743,698	5.9	102,841	3.5	0.7	1.6	19.6	9.1	14.3	40.6	27.6	39.4	36.3	62.5	44.8	0.0	0.0	0.0	
Sarasota CSA	3,046	1,000,576	7.6	74,796	0.8	0.2	0.3	16.8	8.8	12.9	54.7	44.2	48.9	27.6	46.8	37.8	0.0	0.0	0.0	
Ocala CSA	459	89,298	1.1	21,434	0.6	0.2	0.1	14.5	9.6	10.8	69.6	74.3	70.6	15.3	15.9	18.5	0.0	0.0	0.0	
Orlando CSA	7,552	1,997,628	18.8	246,273	1.0	0.6	0.7	18.8	12.8	15.3	49.2	43.7	49.9	31.1	42.9	34.1	0.0	0.0	0.0	
Palm Bay MSA	1,455	378,247	3.6	40,168	1.6	0.8	1.0	21.1	13.1	20.4	43.5	37.1	42.5	33.8	48.9	36.0	0.0	0.0	0.0	
Tallahassee MSA	277	63,712	0.7	12,086	5.0	4.0	4.3	14.3	6.1	12.2	30.7	27.8	30.7	49.2	61.4	51.6	0.8	0.7	1.1	
Total	40,145	15,824,479	100.0	1,086,565	2.0	1.1	1.4	20.1	13.8	16.3	42.1	34.5	42.2	35.7	50.5	40.0	0.1	0.2	0.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Miami CSA	6,714	5,593,955	36.3	191,770	2.7	2.1	2.2	21.3	17.1	20.0	33.7	29.4	35.1	41.2	50.0	41.5	1.1	1.5	1.1	
Tampa MSA	3,061	1,194,800	16.6	123,733	1.7	2.3	1.8	24.4	20.4	22.3	38.7	33.1	37.5	34.8	43.5	38.0	0.5	0.8	0.4	
Limited-Scope:																				
Cape Coral CSA	1,506	908,875	8.1	51,056	1.4	0.9	1.0	17.2	18.3	18.3	46.5	40.8	48.4	34.3	39.0	31.6	0.6	0.9	0.8	
Gainesville MSA	147	70,789	0.8	7,388	4.4	5.4	2.7	14.6	23.1	15.2	28.2	25.9	26.5	51.8	43.5	53.8	0.9	2.0	1.8	
Jacksonville MSA	1,141	414,858	6.2	68,538	3.3	3.2	2.3	20.3	18.8	18.4	40.1	37.6	44.6	35.9	40.1	34.2	0.5	0.4	0.5	
Sarasota CSA	1,388	615,956	7.5	47,397	1.0	0.6	0.4	17.4	15.0	14.4	50.9	41.4	47.5	30.6	41.8	37.2	0.1	1.3	0.6	
Ocala CSA	366	74,155	2.0	16,685	0.3	0.3	0.3	16.7	10.4	11.4	61.7	71.0	70.2	20.3	17.8	17.5	1.1	0.5	0.6	
Orlando CSA	3,434	1,203,480	18.6	158,683	1.3	0.8	1.1	19.6	19.4	17.2	46.0	43.4	47.4	32.7	35.8	33.9	0.4	0.6	0.4	
Palm Bay MSA	622	249,486	3.4	27,026	0.8	1.3	0.9	18.4	20.1	19.4	45.6	44.2	45.6	34.6	34.4	33.5	0.5	0.0	0.6	
Tallahassee MSA	112	25,579	0.6	7,325	4.6	8.9	5.9	12.1	13.4	14.6	33.3	30.4	36.5	50.0	47.3	42.6	0.0	0.0	0.4	
Total	18,491	10,351,933	100.0	699,601	2.0	1.7	1.6	20.5	18.1	18.8	40.7	36.2	42.2	36.2	42.9	36.7	0.6	1.0	0.7	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Miami CSA	14,726	8,050,698	36.7	305,021	22.8	3.1	2.7	17.2	12.0	10.6	17.9	17.0	18.5	42.1	59.9	50.2	0.0	8.1	18.0	
Tampa MSA	6,944	2,094,478	17.3	190,203	21.6	4.3	4.7	17.9	17.4	15.2	19.1	17.3	20.1	41.4	50.8	41.6	0.0	10.1	18.4	
Limited-Scope:																				
Cape Coral CSA	3,035	1,341,803	7.6	82,888	20.8	3.0	3.6	18.2	10.9	14.4	19.5	14.1	19.1	41.5	64.0	47.4	0.0	8.0	15.4	
Gainesville MSA	295	64,341	0.7	10,855	23.4	3.1	4.1	15.4	14.9	13.1	18.2	22.4	20.0	43.0	56.3	47.5	0.0	3.4	15.3	
Jacksonville MSA	2,356	743,698	5.9	102,841	21.7	3.5	4.3	17.4	11.5	13.7	20.0	18.8	19.4	41.0	54.5	39.9	0.0	11.8	22.6	
Sarasota CSA	3,046	1,000,576	7.6	74,796	19.0	5.6	4.8	19.4	16.4	14.9	21.2	19.0	20.3	40.5	52.4	45.4	0.0	6.6	14.6	
Ocala CSA	459	89,298	1.1	21,434	19.3	4.4	3.8	19.5	13.9	14.8	21.6	25.1	21.6	39.7	50.1	39.1	0.0	6.5	20.8	
Orlando CSA	7,552	1,997,628	18.8	246,273	20.7	4.7	3.8	18.4	15.5	13.9	20.1	20.8	20.9	40.8	53.4	41.5	0.0	5.5	19.9	
Palm Bay MSA	1,455	378,247	3.6	40,168	20.2	8.0	6.7	18.6	14.2	17.1	20.6	21.2	20.0	40.6	52.2	35.9	0.0	4.3	20.3	
Tallahassee MSA	277	63,712	0.7	12,086	21.1	3.6	6.2	15.6	15.5	17.8	18.4	20.9	20.4	45.0	54.2	40.0	0.0	5.8	15.7	
Total	40,145	15,824,479	100.0	1,086,565	21.6	4.0	3.9	17.8	14.0	13.5	19.2	18.1	19.7	41.5	56.1	44.3	0.0	7.9	18.6	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Miami CSA	6,714	5,593,955	36.3	191,770	22.1	4.3	3.4	17.8	10.6	10.2	18.3	15.7	17.8	41.8	58.2	50.9	0.0	11.1	17.7	
Tampa MSA	3,061	1,194,800	16.6	123,733	21.1	6.7	5.4	18.3	17.2	15.1	19.2	17.4	21.6	41.4	49.6	42.6	0.0	9.1	15.3	
Limited-Scope:																				
Cape Coral CSA	1,506	908,875	8.1	51,056	20.2	5.1	4.5	18.6	13.8	14.8	20.4	15.8	20.7	40.8	57.3	45.7	0.0	8.0	14.3	
Gainesville MSA	147	70,789	0.8	7,388	18.6	10.2	4.9	16.5	23.8	16.1	18.9	15.6	20.6	46.0	44.9	41.4	0.0	5.4	16.9	
Jacksonville MSA	1,141	414,858	6.2	68,538	21.2	6.6	5.6	18.2	19.6	15.8	20.0	19.9	21.8	40.7	46.8	38.3	0.0	7.1	18.5	
Sarasota CSA	1,388	615,956	7.5	47,397	18.4	7.6	5.5	19.8	14.8	15.1	20.9	19.4	21.0	41.0	51.1	44.8	0.0	7.1	13.6	
Ocala CSA	366	74,155	2.0	16,685	18.0	4.6	5.2	19.8	20.8	16.7	22.1	23.5	23.5	40.2	47.0	37.4	0.0	4.1	17.1	
Orlando CSA	3,434	1,203,480	18.6	158,683	20.5	5.1	3.9	18.5	17.1	13.3	20.0	20.4	22.5	41.0	52.7	43.0	0.0	4.8	17.2	
Palm Bay MSA	622	249,486	3.4	27,026	20.0	10.5	6.5	18.5	17.7	16.0	20.2	20.7	22.1	41.3	47.9	38.4	0.0	3.2	17.0	
Tallahassee MSA	112	25,579	0.6	7,325	20.7	10.7	6.7	15.7	26.8	18.9	18.8	17.0	19.7	44.8	40.2	37.9	0.0	5.4	16.8	
Total	18,491	10,351,933	100.0	699,601	21.0	5.6	4.5	18.2	14.7	13.5	19.4	17.7	20.7	41.4	53.7	44.6	0.0	8.3	16.6	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Miami CSA	79,910	1,942,777	51.5	418,504	4.1	3.3	4.4	21.9	19.0	23.2	29.5	29.1	29.6	43.3	47.5	41.7	1.2	1.0	1.1
Tampa MSA	20,822	412,331	13.4	111,679	4.2	3.4	4.5	20.7	15.7	20.5	34.1	32.2	34.6	40.7	48.4	40.2	0.3	0.3	0.2
Limited-Scope:																			
Cape Coral CSA	7,662	147,542	4.9	45,191	2.9	1.5	2.7	19.6	15.2	19.5	39.8	40.2	40.3	37.7	43.1	37.4	0.1	0.0	0.0
Gainesville MSA	1,000	14,179	0.6	6,639	7.1	7.4	7.7	17.4	11.5	16.0	35.3	31.9	34.8	39.1	48.1	40.8	1.1	1.1	0.7
Jacksonville MSA	6,533	105,233	4.2	46,757	4.4	2.4	4.3	21.8	15.2	21.5	34.4	29.8	33.2	39.4	52.6	41.0	0.0	0.0	0.0
Sarasota CSA	7,568	150,825	4.9	36,749	1.2	0.5	1.0	19.0	13.6	17.4	47.1	45.0	46.3	32.7	40.9	35.3	0.0	0.0	0.0
Ocala CSA	1,023	14,709	0.7	9,210	1.8	0.9	1.7	16.6	14.7	16.2	63.4	63.4	65.9	18.2	21.0	16.2	0.0	0.0	0.0
Orlando CSA	26,374	547,679	17.0	140,979	2.0	1.3	2.1	24.3	19.0	23.6	40.8	38.5	40.8	32.8	41.2	33.5	0.0	0.0	0.0
Palm Bay MSA	3,591	88,535	2.3	16,731	2.7	1.7	2.4	23.2	19.8	23.5	39.0	36.0	38.4	35.0	42.5	35.7	0.1	0.0	0.0
Tallahassee MSA	684	8,082	0.4	7,790	9.2	6.3	8.3	21.0	19.7	23.2	33.0	30.7	33.4	35.1	41.7	34.2	1.8	1.6	0.8
Total	155,167	3,431,892	100.0	840,229	3.6	2.7	3.8	21.8	17.9	22.2	34.6	32.9	34.3	39.4	45.9	39.1	0.6	0.6	0.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Miami CSA	133,203	2,075,932	48.1	394,959	2.9	2.2	2.9	22.3	18.8	21.8	29.9	30.5	30.4	42.3	46.1	42.6	2.6	2.3	2.4
Tampa MSA	40,059	560,316	14.5	110,105	3.1	2.1	3.2	21.2	16.7	21.7	33.1	32.4	34.2	40.7	47.0	39.1	1.8	1.7	1.8
Limited-Scope:																			
Cape Coral CSA	14,624	202,895	5.3	46,231	2.4	1.0	2.0	19.8	15.3	19.8	44.5	47.2	46.5	32.5	35.5	31.1	0.8	0.9	0.6
Gainesville MSA	2,020	23,576	0.7	6,672	4.7	2.7	4.2	18.3	14.7	18.3	29.8	27.9	29.2	44.0	52.1	45.9	3.2	2.6	2.4
Jacksonville MSA	13,237	177,873	4.8	47,152	4.7	2.2	4.4	22.4	14.4	19.3	38.3	35.1	38.8	32.7	47.1	35.8	1.9	1.2	1.6
Sarasota CSA	13,914	199,603	5.0	36,606	1.1	0.4	0.9	16.1	11.9	14.8	48.8	45.3	48.0	33.7	41.9	36.0	0.2	0.5	0.3
Ocala CSA	2,163	26,143	0.8	9,672	1.3	0.7	1.1	19.5	16.2	20.1	56.6	58.8	57.5	21.9	23.7	20.1	0.8	0.6	1.0
Orlando CSA	50,088	684,798	18.1	145,469	2.3	1.4	1.9	24.7	19.6	23.6	38.5	36.5	38.6	33.6	41.6	35.0	0.9	0.9	1.0
Palm Bay MSA	5,808	84,594	2.1	16,348	2.8	1.8	2.7	20.5	16.2	20.2	41.3	39.5	40.2	34.9	41.9	36.5	0.5	0.6	0.5
Tallahassee MSA	1,738	19,391	0.6	7,152	8.6	6.5	7.3	15.7	9.8	13.7	39.2	34.6	41.1	34.2	46.7	36.5	2.2	2.4	1.5
Total	276,854	4,055,121	100.0	820,366	2.9	1.9	2.7	22.0	17.8	21.4	34.7	34.1	35.1	38.5	44.5	39.0	1.9	1.7	1.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Miami CSA	79,910	1,942,777	51.5	418,504	94.3	65.8	43.0	1.9	12.8	3.8	21.4
Tampa MSA	20,822	412,331	13.4	111,679	92.9	68.5	46.6	2.1	13.8	4.9	17.6
Limited-Scope:											
Cape Coral CSA	7,662	147,542	4.9	45,191	93.3	66.8	46.2	2.0	14.5	4.7	18.7
Gainesville MSA	1,000	14,179	0.6	6,639	90.4	72.4	43.9	2.5	12.3	7.1	15.3
Jacksonville MSA	6,533	105,233	4.2	46,757	92.2	70.3	43.5	2.2	13.5	5.6	16.2
Sarasota CSA	7,568	150,825	4.9	36,749	93.1	65.8	49.9	2.1	15.0	4.8	19.2
Ocala CSA	1,023	14,709	0.7	9,210	92.6	74.7	46.9	2.1	13.5	5.3	11.8
Orlando CSA	26,374	547,679	17.0	140,979	93.3	67.3	46.0	1.9	13.5	4.9	19.2
Palm Bay MSA	3,591	88,535	2.3	16,731	92.1	65.9	47.5	2.2	13.9	5.7	20.2
Tallahassee MSA	684	8,082	0.4	7,790	90.6	74.7	45.5	2.4	15.4	7.0	9.9
Total	155,167	3,431,892	100.0	840,229	93.5	66.8	44.6	2.0	13.3	4.5	19.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Miami CSA	133,203	2,075,932	48.1	394,959	94.5	79.9	52.4	1.4	13.4	4.1	6.7
Tampa MSA	40,059	560,316	14.5	110,105	93.6	77.8	52.4	1.5	13.4	4.9	8.8
Limited-Scope:											
Cape Coral CSA	14,624	202,895	5.3	46,231	93.7	75.3	51.8	1.5	15.1	4.8	9.6
Gainesville MSA	2,020	23,576	0.7	6,672	91.2	76.5	48.5	1.9	12.2	6.9	11.2
Jacksonville MSA	13,237	177,873	4.8	47,152	92.9	78.0	50.6	1.6	12.8	5.4	9.2
Sarasota CSA	13,914	199,603	5.0	36,606	93.5	74.7	53.8	1.6	14.9	4.9	10.4
Ocala CSA	2,163	26,143	0.8	9,672	93.1	77.5	51.3	1.5	14.7	5.4	7.8
Orlando CSA	50,088	684,798	18.1	145,469	93.7	79.1	53.1	1.4	12.9	5.0	7.9
Palm Bay MSA	5,808	84,594	2.1	16,348	92.7	75.5	54.3	1.7	12.6	5.6	11.9
Tallahassee MSA	1,738	19,391	0.6	7,152	91.6	78.5	50.3	1.8	11.1	6.6	10.4
Total	276,854	4,055,121	100.0	820,366	93.9	78.7	52.4	1.5	13.4	4.6	7.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Miami CSA	495	7,954	43.6	1,005	4.8	0.8	2.7	25.2	10.5	12.9	32.4	32.1	32.5	37.3	56.6	51.7	0.4	0.0	0.1	
Tampa MSA	138	1,598	12.2	294	3.1	1.4	2.0	24.8	16.7	23.5	38.9	35.5	36.1	33.1	46.4	38.4	0.1	0.0	0.0	
Limited-Scope:																				
Cape Coral CSA	64	798	5.6	163	4.0	1.6	3.7	24.8	15.6	22.7	45.2	37.5	43.6	25.9	45.3	30.1	0.0	0.0	0.0	
Gainesville MSA	17	157	1.5	70	3.9	0.0	0.0	13.7	29.4	22.9	49.4	52.9	51.4	32.7	17.6	25.7	0.3	0.0	0.0	
Jacksonville MSA	40	470	3.5	127	3.5	0.0	0.8	21.2	15.0	18.9	43.5	47.5	52.0	31.8	37.5	28.3	0.0	0.0	0.0	
Sarasota CSA	53	560	4.7	142	1.9	0.0	0.0	21.1	15.1	15.5	47.5	35.8	31.7	29.4	49.1	52.8	0.0	0.0	0.0	
Ocala CSA	69	868	6.1	151	1.0	0.0	0.7	17.8	10.1	14.6	67.7	75.4	72.2	13.5	14.5	12.6	0.0	0.0	0.0	
Orlando CSA	224	2,538	19.7	513	1.5	0.4	0.4	23.0	14.7	16.2	48.3	46.0	51.3	27.1	38.8	32.0	0.1	0.0	0.2	
Palm Bay MSA	24	305	2.1	54	3.6	0.0	0.0	25.5	29.2	16.7	42.8	41.7	50.0	28.1	29.2	33.3	0.0	0.0	0.0	
Tallahassee MSA	11	86	1.0	23	5.6	0.0	0.0	15.4	0.0	8.7	33.5	9.1	30.4	44.8	72.7	52.2	0.8	18.2	8.7	
Total	1,135	15,334	100.0	2,542	3.3	0.7	1.7	23.4	13.3	16.3	41.6	39.2	41.6	31.5	46.6	40.3	0.2	0.2	0.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Miami CSA	1,074	13,295	42.9	1,031	3.9	2.0	2.3	24.9	11.2	13.4	31.4	31.2	29.9	38.3	54.7	53.4	1.4	0.9	1.0
Tampa MSA	370	3,912	14.8	348	2.8	1.4	0.9	27.2	20.8	20.1	39.0	44.6	47.7	30.4	33.2	30.7	0.6	0.0	0.6
Limited-Scope:																			
Cape Coral CSA	160	1,831	6.4	170	4.0	1.3	4.1	23.8	7.5	10.0	46.3	44.4	44.7	25.5	46.3	40.6	0.4	0.6	0.6
Gainesville MSA	49	464	2.0	72	4.9	2.0	1.4	18.4	34.7	19.4	27.8	32.7	33.3	48.2	30.6	44.4	0.7	0.0	1.4
Jacksonville MSA	95	933	3.8	166	4.3	5.3	3.6	23.9	13.7	16.3	43.1	36.8	49.4	27.3	42.1	27.7	1.4	2.1	3.0
Sarasota CSA	126	1,485	5.0	131	1.6	0.0	0.0	21.0	8.7	1.5	47.8	38.1	42.7	29.3	53.2	55.7	0.3	0.0	0.0
Ocala CSA	133	1,485	5.3	151	0.9	0.0	0.0	24.0	13.5	19.2	47.1	43.6	40.4	26.5	42.9	40.4	1.4	0.0	0.0
Orlando CSA	412	5,114	16.5	509	1.9	0.0	0.4	23.4	19.2	18.3	45.9	44.7	47.3	28.2	35.2	32.6	0.6	1.0	1.4
Palm Bay MSA	55	558	2.2	50	2.7	5.5	4.0	24.4	9.1	10.0	41.4	32.7	30.0	29.9	52.7	56.0	1.6	0.0	0.0
Tallahassee MSA	28	301	1.1	41	6.1	3.6	0.0	13.3	0.0	4.9	36.5	35.7	26.8	43.5	60.7	68.3	0.7	0.0	0.0
Total	2,502	29,378	100.0	2,669	3.1	1.6	1.7	24.2	14.1	14.9	39.7	37.6	39.0	32.0	46.1	43.5	0.9	0.7	1.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Miami CSA	495	7,954	43.6	1,005	97.4	75.4	68.5	1.6	11.7	1.0	12.9
Tampa MSA	138	1,598	12.2	294	97.6	71.0	61.9	1.4	11.6	1.1	17.4
Limited-Scope:											
Cape Coral CSA	64	798	5.6	163	97.2	67.2	66.3	1.7	12.5	1.1	20.3
Gainesville MSA	17	157	1.5	70	96.6	94.1	58.6	1.9	0.0	1.5	5.9
Jacksonville MSA	40	470	3.5	127	97.9	82.5	52.8	1.2	7.5	0.9	10.0
Sarasota CSA	53	560	4.7	142	97.4	84.9	69.0	1.4	3.8	1.1	11.3
Ocala CSA	69	868	6.1	151	98.3	76.8	68.9	1.1	5.8	0.6	17.4
Orlando CSA	224	2,538	19.7	513	97.3	71.4	65.3	1.6	14.3	1.1	14.3
Palm Bay MSA	24	305	2.1	54	98.4	70.8	63.0	1.0	4.2	0.6	25.0
Tallahassee MSA	11	86	1.0	23	98.0	90.9	73.9	1.0	0.0	1.0	9.1
Total	1,135	15,334	100.0	2,542	97.5	74.7	65.9	1.5	10.9	1.0	14.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Miami CSA	1,074	13,295	42.9	1,031	97.4	79.7	74.6	1.2	11.6	1.4	8.7
Tampa MSA	370	3,912	14.8	348	97.2	76.2	65.2	1.0	12.4	1.7	11.4
Limited-Scope:											
Cape Coral CSA	160	1,831	6.4	170	97.2	76.9	75.3	1.3	10.0	1.5	13.1
Gainesville MSA	49	464	2.0	72	96.9	75.5	66.7	1.3	14.3	1.8	10.2
Jacksonville MSA	95	933	3.8	166	97.6	84.2	62.0	0.9	7.4	1.6	8.4
Sarasota CSA	126	1,485	5.0	131	97.5	77.8	74.8	1.1	6.3	1.4	15.9
Ocala CSA	133	1,485	5.3	151	97.4	78.2	64.9	0.9	5.3	1.7	16.5
Orlando CSA	412	5,114	16.5	509	96.9	73.1	65.6	1.2	15.8	1.9	11.2
Palm Bay MSA	55	558	2.2	50	97.8	72.7	72.0	0.7	12.7	1.5	14.5
Tallahassee MSA	28	301	1.1	41	97.9	78.6	78.0	0.5	7.1	1.6	14.3
Total	2,502	29,378	100.0	2,669	97.3	77.7	70.2	1.1	11.6	1.6	10.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Atlanta CSA	12,053	4,314,224	97.3	378,163	3.3	3.5	3.0	17.4	13.9	15.0	36.1	28.1	35.0	43.1	54.5	47.0	0.0	0.0	0.0
Limited-Scope:																			
Savannah CSA	332	120,890	2.7	15,703	5.6	3.0	2.8	21.2	16.0	15.4	33.5	30.4	31.8	39.8	50.6	50.0	0.0	0.0	0.0
Total	12,385	4,435,114	100.0	393,866	3.4	3.4	3.0	17.6	13.9	15.0	36.0	28.2	34.9	43.0	54.4	47.1	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Atlanta CSA	4,552	2,006,346	95.7	221,548	3.1	4.0	3.4	17.2	18.8	17.2	35.0	29.3	36.4	43.4	45.9	41.4	1.3	2.0	1.6	
Limited-Scope:																				
Savannah CSA	204	65,710	4.3	9,678	5.7	6.4	5.0	24.9	27.5	20.5	34.5	32.4	42.3	33.4	32.4	29.7	1.5	1.5	2.5	
Total	4,756	2,072,056	100.0	231,226	3.2	4.1	3.5	17.6	19.2	17.3	35.0	29.5	36.6	43.0	45.3	41.0	1.3	2.0	1.7	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Atlanta CSA	12,053	4,314,224	97.3	378,163	22.3	7.8	5.9	16.3	18.5	16.0	18.1	17.9	19.2	43.2	50.5	38.8	0.0	5.3	20.0	
Limited-Scope:																				
Savannah CSA	332	120,890	2.7	15,703	25.1	3.6	5.0	16.6	17.8	16.6	20.2	22.0	19.8	38.2	47.6	33.8	0.0	9.0	24.8	
Total	12,385	4,435,114	100.0	393,866	22.5	7.7	5.9	16.3	18.5	16.0	18.2	18.0	19.3	43.0	50.4	38.6	0.0	5.4	20.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Atlanta CSA	4,552	2,006,346	95.7	221,548	21.1	8.6	6.2	16.8	19.9	17.6	19.3	20.0	21.1	42.8	45.7	37.1	0.0	5.8	18.0	
Limited-Scope:																				
Savannah CSA	204	65,710	4.3	9,678	24.3	6.9	4.4	18.3	20.6	16.5	18.4	20.6	21.7	39.0	46.1	38.2	0.0	5.9	19.2	
Total	4,756	2,072,056	100.0	231,226	21.3	8.5	6.1	16.9	20.0	17.5	19.2	20.0	21.1	42.6	45.7	37.2	0.0	5.8	18.1	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Atlanta CSA	33,808	687,167	98.0	250,020	6.5	4.4	5.7	22.3	17.0	21.3	30.4	27.2	31.0	40.4	51.2	41.7	0.4	0.2	0.3	
Limited-Scope:																				
Savannah CSA	677	8,879	2.0	9,513	8.7	6.9	8.6	24.0	20.1	22.6	31.7	28.4	32.3	35.4	44.6	36.4	0.2	0.0	0.1	
Total	34,485	696,046	100.0	259,533	6.5	4.4	5.8	22.3	17.1	21.4	30.5	27.3	31.0	40.2	51.1	41.5	0.4	0.2	0.3	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Atlanta CSA	66,382	921,751	97.5	242,620	5.9	3.8	4.9	21.6	16.3	19.9	29.5	27.4	30.7	40.0	50.3	42.0	3.0	2.2	2.5	
Limited-Scope:																				
Savannah CSA	1,669	20,297	2.5	8,946	12.3	8.1	12.3	30.0	27.4	28.4	30.2	33.3	31.3	24.8	29.6	25.5	2.7	1.6	2.4	
Total	68,051	942,048	100.0	251,566	6.1	3.9	5.1	21.9	16.6	20.2	29.5	27.6	30.7	39.5	49.8	41.4	3.0	2.2	2.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Atlanta CSA	33,808	687,167	98.0	250,020	93.0	69.3	42.3	2.2	13.5	4.9	17.2
Limited-Scope:											
Savannah CSA	677	8,879	2.0	9,513	88.8	68.8	41.5	3.0	18.9	8.1	12.3
Total	34,485	696,046	100.0	259,533	92.8	69.3	42.3	2.2	13.6	5.0	17.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Atlanta CSA	66,382	921,751	97.5	242,620	94.6	79.2	48.6	1.5	12.5	3.9	8.3
Limited-Scope:											
Savannah CSA	1,669	20,297	2.5	8,946	91.5	75.3	47.9	2.1	16.2	6.4	8.5
Total	68,051	942,048	100.0	251,566	94.5	79.1	48.6	1.6	12.6	4.0	8.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Atlanta CSA	154	1,832	90.6	504	4.5	1.9	2.0	19.1	11.0	12.5	37.1	42.9	38.9	39.2	44.2	46.6	0.1	0.0	0.0
Limited-Scope:																			
Savannah CSA	16	114	9.4	29	5.5	0.0	0.0	22.6	6.3	13.8	37.2	25.0	34.5	34.7	68.8	51.7	0.0	0.0	0.0
Total	170	1,946	100.0	533	4.5	1.8	1.9	19.2	10.6	12.6	37.1	41.2	38.6	39.0	46.5	46.9	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Atlanta CSA	392	4,393	95.4	576	4.3	4.6	2.1	20.4	17.6	13.7	37.2	32.9	38.9	36.5	43.1	44.3	1.6	1.8	1.0
Limited-Scope:																			
Savannah CSA	19	228	4.6	28	7.3	0.0	7.1	30.3	10.5	10.7	31.7	68.4	53.6	29.1	21.1	28.6	1.5	0.0	0.0
Total	411	4,621	100.0	604	4.4	4.4	2.3	20.8	17.3	13.6	37.0	34.6	39.6	36.2	42.1	43.5	1.6	1.7	1.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Atlanta CSA	154	1,832	90.6	504	97.2	75.3	60.1	1.4	7.8	1.4	16.9
Limited-Scope:											
Savannah CSA	16	114	9.4	29	97.3	56.3	65.5	1.7	0.0	1.1	43.8
Total	170	1,946	100.0	533	97.2	73.5	60.4	1.4	7.1	1.3	19.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Atlanta CSA	392	4,393	95.4	576	97.8	81.6	66.0	1.0	8.4	1.1	9.9
Limited-Scope:											
Savannah CSA	19	228	4.6	28	97.9	78.9	82.1	1.1	5.3	1.0	15.8
Total	411	4,621	100.0	604	97.8	81.5	66.7	1.0	8.3	1.1	10.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Boise City MSA	1,979	631,020	67.7	68,614	1.5	1.2	1.5	23.5	20.4	19.8	45.6	39.5	47.7	29.4	39.0	31.1	0.0	0.0	0.0	
Limited-Scope:																				
Coeur d’ Alene MSA	538	203,460	18.4	17,042	0.0	0.0	0.0	12.8	14.5	15.2	72.0	68.6	71.8	15.3	16.9	13.0	0.0	0.0	0.0	
Idaho Falls MSA	196	46,690	6.7	9,416	0.0	0.0	0.0	16.3	16.3	16.2	48.7	45.9	46.3	35.0	37.8	37.4	0.0	0.0	0.0	
Pocatello MSA	71	17,691	2.4	5,726	1.8	0.0	3.1	16.1	7.0	15.7	49.4	42.3	43.7	32.8	50.7	37.5	0.0	0.0	0.0	
Twin Falls MSA	85	21,229	2.9	6,100	0.0	0.0	0.0	2.6	2.4	2.7	84.7	87.1	86.5	12.7	10.6	10.8	0.0	0.0	0.0	
Non-MSA ID	56	13,999	1.9	3,794	0.0	0.0	0.0	0.0	0.0	0.0	72.2	64.3	79.4	27.8	35.7	20.6	0.0	0.0	0.0	
Total	2,925	934,089	100.0	110,692	1.0	0.8	1.1	18.0	17.8	16.9	54.1	47.2	54.3	26.9	34.3	27.7	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Boise City MSA	587	253,734	65.2	34,294	0.6	1.5	0.9	15.9	13.1	16.1	50.7	44.5	50.6	32.7	40.9	32.3	0.0	0.0	0.0
Limited-Scope:																			
Coeur d’ Alene MSA	145	92,666	16.1	8,354	0.0	0.0	0.0	14.1	13.1	12.3	60.9	58.6	66.0	25.0	28.3	21.7	0.0	0.0	0.0
Idaho Falls MSA	73	23,437	8.1	5,401	0.0	0.0	0.0	17.8	23.3	18.2	53.8	37.0	51.4	28.4	39.7	30.4	0.0	0.0	0.0
Pocatello MSA	31	9,759	3.4	3,471	2.5	0.0	3.7	21.2	19.4	20.9	58.7	64.5	57.8	17.6	16.1	17.6	0.0	0.0	0.0
Twin Falls MSA	41	13,070	4.6	3,696	0.0	0.0	0.0	11.4	14.6	11.9	74.8	65.9	70.7	13.7	19.5	17.4	0.0	0.0	0.0
Non-MSA ID	24	5,625	2.7	2,137	0.0	0.0	0.0	5.8	8.3	4.6	70.6	79.2	72.8	23.6	12.5	22.6	0.0	0.0	0.0
Total	901	398,291	100.0	57,353	0.5	1.0	0.8	15.4	14.1	15.4	55.7	48.7	55.5	28.4	36.2	28.4	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Boise City MSA	1,979	631,020	67.7	68,614	19.2	7.6	5.0	18.7	18.7	15.1	21.7	20.5	23.7	40.4	50.1	44.5	0.0	3.2	11.8	
Limited-Scope:																				
Coeur d’ Alene MSA	538	203,460	18.4	17,042	18.0	3.9	2.7	20.3	18.8	10.7	22.7	19.1	20.5	39.0	55.0	50.5	0.0	3.2	15.6	
Idaho Falls MSA	196	46,690	6.7	9,416	18.8	10.2	5.2	18.7	23.5	17.5	20.6	18.9	24.4	41.8	47.4	39.8	0.0	0.0	13.1	
Pocatello MSA	71	17,691	2.4	5,726	21.2	4.2	5.5	19.2	16.9	16.2	19.5	19.7	23.0	40.1	53.5	42.3	0.0	5.6	13.0	
Twin Falls MSA	85	21,229	2.9	6,100	18.5	5.9	4.6	18.3	8.2	17.9	22.2	21.2	23.9	41.0	60.0	40.7	0.0	4.7	12.8	
Non-MSA ID	56	13,999	1.9	3,794	18.2	1.8	2.5	15.2	10.7	10.9	20.9	23.2	21.7	45.8	58.9	44.3	0.0	5.4	20.6	
Total	2,925	934,089	100.0	110,692	19.0	6.8	4.6	18.7	18.5	14.7	21.6	20.2	23.2	40.7	51.4	44.7	0.0	3.1	12.9	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Boise City MSA	587	253,734	65.2	34,294	17.1	7.7	6.1	19.1	16.7	15.8	22.9	20.3	25.0	40.9	50.6	44.5	0.0	4.8	8.6
Limited-Scope:																			
Coeur d’ Alene MSA	145	92,666	16.1	8,354	19.2	4.8	5.0	19.2	9.7	11.8	22.1	16.6	22.0	39.6	62.8	49.1	0.0	6.2	12.1
Idaho Falls MSA	73	23,437	8.1	5,401	18.5	9.6	5.8	19.9	13.7	17.6	21.5	24.7	26.4	40.2	45.2	40.5	0.0	6.8	9.7
Pocatello MSA	31	9,759	3.4	3,471	18.6	6.5	5.7	19.5	12.9	17.2	21.1	19.4	25.5	40.8	58.1	42.7	0.0	3.2	9.0
Twin Falls MSA	41	13,070	4.6	3,696	18.4	4.9	6.7	18.1	19.5	19.2	22.6	22.0	26.2	40.9	46.3	39.6	0.0	7.3	8.4
Non-MSA ID	24	5,625	2.7	2,137	17.4	20.8	3.4	17.7	25.0	13.0	22.3	16.7	26.3	42.6	33.3	45.3	0.0	4.2	12.1
Total	901	398,291	100.0	57,353	17.8	7.5	5.8	19.0	15.5	15.6	22.5	20.0	24.9	40.7	51.7	44.4	0.0	5.2	9.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Boise City MSA	4,029	61,177	68.4	18,117	8.1	8.1	9.4	22.4	16.2	21.6	39.1	38.0	37.6	30.5	37.7	31.4	0.0	0.0	0.0		
Limited-Scope:																					
Coeur d’ Alene MSA	754	9,396	12.8	4,828	0.0	0.0	0.0	20.7	21.6	18.6	65.8	59.8	69.1	13.5	18.6	12.3	0.0	0.0	0.0		
Idaho Falls MSA	521	9,797	8.8	3,295	0.0	0.0	0.0	22.5	21.1	21.0	37.1	35.5	38.9	40.4	43.4	40.1	0.0	0.0	0.0		
Pocatello MSA	203	2,791	3.4	1,492	4.1	8.4	3.8	22.3	19.2	23.6	44.7	42.4	46.0	29.0	30.0	26.7	0.0	0.0	0.0		
Twin Falls MSA	204	2,425	3.5	1,974	0.0	0.0	0.0	8.6	3.9	9.0	77.3	78.9	75.7	14.1	17.2	15.2	0.0	0.0	0.0		
Non-MSA ID	182	3,485	3.1	1,157	0.0	0.0	0.0	1.6	1.6	0.3	76.4	83.5	77.5	22.0	14.8	22.1	0.0	0.0	0.0		
Total	5,893	89,071	100.0	30,863	5.1	5.9	5.7	20.5	16.5	19.6	46.8	43.5	47.0	27.5	34.1	27.8	0.0	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Boise City MSA	7,681	95,855	67.1	18,373	1.6	1.1	1.6	16.9	13.6	17.6	46.4	43.9	46.9	35.0	41.3	33.8	0.1	0.0	0.1
Limited-Scope:																			
Coeur d’ Alene MSA	1,612	18,570	14.1	5,065	0.0	0.0	0.0	18.9	13.6	18.0	56.7	58.4	56.3	24.3	28.0	25.7	0.0	0.0	0.0
Idaho Falls MSA	938	10,722	8.2	3,102	0.0	0.0	0.0	24.5	17.4	23.0	39.3	41.3	39.2	36.2	41.4	37.8	0.0	0.0	0.0
Pocatello MSA	395	4,230	3.5	1,452	3.5	3.0	4.5	29.6	27.3	28.6	49.5	47.3	49.8	17.4	22.3	17.1	0.0	0.0	0.0
Twin Falls MSA	444	5,085	3.9	1,854	0.0	0.0	0.0	18.1	9.5	17.7	65.5	70.3	62.9	16.4	20.3	19.3	0.0	0.0	0.0
Non-MSA ID	374	4,115	3.3	1,093	0.0	0.0	0.0	6.2	12.0	7.1	58.4	55.3	59.4	35.4	32.6	33.5	0.0	0.0	0.0
Total	11,444	138,577	100.0	30,939	1.1	0.9	1.1	18.3	14.2	18.4	49.1	47.2	49.2	31.4	37.7	31.2	0.1	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Boise City MSA	4,029	61,177	68.4	18,117	91.6	68.3	51.8	2.4	14.4	6.0	17.2
Limited-Scope:											
Coeur d' Alene MSA	754	9,396	12.8	4,828	92.3	67.4	55.3	2.5	17.5	5.2	15.1
Idaho Falls MSA	521	9,797	8.8	3,295	88.7	64.5	49.7	3.3	20.9	8.0	14.6
Pocatello MSA	203	2,791	3.4	1,492	87.5	65.5	52.7	3.0	20.2	9.5	14.3
Twin Falls MSA	204	2,425	3.5	1,974	88.0	76.5	56.4	2.9	12.3	9.1	11.3
Non-MSA ID	182	3,485	3.1	1,157	86.6	61.5	58.4	3.0	20.3	10.4	18.1
Total	5,893	89,071	100.0	30,863	90.8	67.8	52.7	2.6	15.7	6.6	16.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Boise City MSA	7,681	95,855	67.1	18,373	93.3	74.2	53.1	1.9	14.4	4.8	11.4
Limited-Scope:											
Coeur d' Alene MSA	1,612	18,570	14.1	5,065	94.4	73.8	56.5	1.7	13.9	3.9	12.3
Idaho Falls MSA	938	10,722	8.2	3,102	91.2	72.3	50.6	2.4	14.7	6.5	13.0
Pocatello MSA	395	4,230	3.5	1,452	89.9	70.4	51.7	2.2	20.5	7.9	9.1
Twin Falls MSA	444	5,085	3.9	1,854	90.3	81.5	58.4	2.2	7.9	7.4	10.6
Non-MSA ID	374	4,115	3.3	1,093	89.7	73.8	58.0	2.1	10.4	8.2	15.8
Total	11,444	138,577	100.0	30,939	92.8	74.2	53.8	2.0	14.2	5.3	11.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

2020-2021

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Boise City MSA	96	899	54.9	493	3.9	0.0	1.6	26.6	20.8	39.6	44.0	68.8	41.6	25.5	10.4	17.2	0.0	0.0	0.3
Limited-Scope:																			
Coeur d' Alene MSA	18	177	10.3	65	0.0	0.0	0.0	16.5	5.6	9.2	69.7	88.9	83.1	13.8	5.6	7.7	0.0	0.0	0.0
Idaho Falls MSA	13	170	7.4	146	0.0	0.0	0.0	11.5	7.7	2.7	44.8	46.2	58.2	43.6	46.2	39.0	0.0	0.0	0.0
Pocatello MSA	4	90	2.3	73	1.7	0.0	0.0	16.6	0.0	1.4	48.3	50.0	80.8	33.4	50.0	17.8	0.0	0.0	0.0
Twin Falls MSA	32	360	18.3	247	0.0	0.0	0.0	2.2	0.0	0.4	84.5	87.5	89.1	13.3	12.5	10.5	0.0	0.0	0.0
Non-MSA ID	12	148	6.9	148	0.0	0.0	0.0	0.4	0.0	0.0	62.1	91.7	54.7	37.5	8.3	45.3	0.0	0.0	0.0
Total	175	1,844	100.0	1,172	2.2	0.0	0.7	18.8	12.6	17.7	53.5	73.7	60.1	25.5	13.7	21.6	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Boise City MSA	202	2,121	58.7	440	0.8	0.5	0.5	19.9	22.3	31.4	46.3	38.6	38.4	32.9	38.6	29.8	0.0	0.0	0.0	
Limited-Scope:																				
Coeur d’ Alene MSA	25	161	7.3	68	0.0	0.0	0.0	15.6	20.0	13.2	55.5	68.0	50.0	28.9	12.0	36.8	0.0	0.0	0.0	
Idaho Falls MSA	29	334	8.4	115	0.0	0.0	0.0	15.8	6.9	6.1	42.7	37.9	53.9	41.5	55.2	40.0	0.0	0.0	0.0	
Pocatello MSA	16	158	4.7	47	1.1	0.0	0.0	17.7	12.5	14.9	66.6	81.3	83.0	14.6	6.3	2.1	0.0	0.0	0.0	
Twin Falls MSA	43	485	12.5	167	0.0	0.0	0.0	6.4	2.3	4.2	82.8	93.0	88.0	10.7	4.7	7.8	0.0	0.0	0.0	
Non-MSA ID	29	355	8.4	106	0.0	0.0	0.0	9.8	27.6	9.4	72.5	48.3	84.0	17.7	24.1	6.6	0.0	0.0	0.0	
Total	344	3,614	100.0	943	0.5	0.3	0.2	16.7	18.3	18.9	54.1	50.3	57.3	28.7	31.1	23.6	0.0	0.0	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Boise City MSA	96	899	54.9	493	96.5	65.6	58.2	2.4	13.5	1.1	20.8
Limited-Scope:											
Coeur d' Alene MSA	18	177	10.3	65	98.4	61.1	72.3	0.9	16.7	0.7	22.2
Idaho Falls MSA	13	170	7.4	146	96.7	61.5	59.6	2.2	15.4	1.2	23.1
Pocatello MSA	4	90	2.3	73	97.9	50.0	50.7	0.7	0.0	1.4	50.0
Twin Falls MSA	32	360	18.3	247	95.2	59.4	45.3	2.9	21.9	1.9	18.8
Non-MSA ID	12	148	6.9	148	96.2	66.7	60.1	2.2	16.7	1.6	16.7
Total	175	1,844	100.0	1,172	96.6	63.4	56.2	2.2	15.4	1.2	21.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Boise City MSA	202	2,121	58.7	440	97.2	69.8	58.9	1.8	12.4	1.0	17.8
Limited-Scope:											
Coeur d' Alene MSA	25	161	7.3	68	98.9	76.0	76.5	0.6	4.0	0.5	20.0
Idaho Falls MSA	29	334	8.4	115	97.4	51.7	71.3	1.9	20.7	0.7	27.6
Pocatello MSA	16	158	4.7	47	98.3	75.0	72.3	0.6	0.0	1.1	25.0
Twin Falls MSA	43	485	12.5	167	96.1	60.5	46.7	1.9	20.9	2.0	18.6
Non-MSA ID	29	355	8.4	106	96.7	41.4	58.5	1.8	41.4	1.5	17.2
Total	344	3,614	100.0	943	97.3	65.4	60.1	1.6	15.4	1.1	19.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	638	91,208	32.3	14,703	5.1	1.4	2.4	15.9	9.2	12.6	33.5	32.8	35.1	45.4	56.4	49.9	0.0	0.2	0.1
Limited-Scope:																			
Bloomington MSA	413	84,118	20.9	8,349	2.3	1.7	2.7	14.3	9.0	11.8	53.9	38.3	49.7	29.5	51.1	35.7	0.0	0.0	0.0
Champaign MSA	403	72,538	20.4	8,000	4.9	1.7	3.7	10.8	10.2	9.4	58.1	49.1	58.4	26.1	38.2	28.4	0.1	0.7	0.2
Davenport MSA	74	10,453	3.8	8,182	0.8	0.0	0.5	23.3	18.9	18.3	65.8	66.2	69.6	10.1	14.9	11.7	0.0	0.0	0.0
Peoria MSA	306	55,825	15.5	13,467	4.2	1.6	1.6	15.1	8.5	13.3	47.9	36.9	47.7	32.8	52.9	37.5	0.0	0.0	0.0
Springfield MSA	139	23,103	7.0	9,173	9.2	2.9	5.2	12.4	7.9	12.3	45.9	43.9	47.1	32.4	45.3	35.4	0.0	0.0	0.0
Total	1,973	337,245	100.0	61,874	4.6	1.6	2.6	15.4	9.5	12.9	48.9	39.9	49.2	31.1	48.7	35.3	0.0	0.2	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	305	42,044	29.2	9,074	3.1	5.9	2.7	21.3	27.2	21.0	34.5	33.4	37.6	40.9	33.4	38.5	0.3	0.0	0.2
Limited-Scope:																			
Bloomington MSA	192	40,686	18.4	4,793	0.8	1.0	1.4	23.7	23.4	23.6	51.0	45.3	51.1	22.6	27.1	21.9	1.9	3.1	2.0
Champaign MSA	162	39,180	15.5	4,695	4.4	3.7	4.8	21.1	24.1	22.1	34.2	29.0	30.9	39.7	42.0	41.1	0.6	1.2	1.1
Davenport MSA	54	7,269	5.2	5,677	2.8	0.0	2.0	19.2	29.6	17.6	62.8	61.1	66.3	15.2	9.3	14.1	0.0	0.0	0.0
Peoria MSA	216	35,243	20.7	8,906	2.8	1.9	1.1	19.0	20.4	18.9	55.5	49.1	57.5	22.7	28.7	22.6	0.0	0.0	0.0
Springfield MSA	117	18,986	11.2	5,687	7.4	4.3	6.0	18.2	28.2	23.0	36.4	32.5	32.8	38.1	35.0	38.2	0.0	0.0	0.0
Total	1,046	183,408	100.0	38,832	3.6	3.3	2.8	20.2	24.9	20.8	45.4	39.5	46.5	30.5	31.5	29.5	0.3	0.8	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Rockford MSA	638	91,208	32.3	14,703	21.9	7.5	10.0	17.0	22.1	19.7	20.4	28.7	22.3	40.7	38.2	28.3	0.0	3.4	19.7	
Limited-Scope:																				
Bloomington MSA	413	84,118	20.9	8,349	19.4	10.2	12.5	17.3	20.8	17.8	22.2	25.2	21.8	41.1	42.9	28.8	0.0	1.0	19.1	
Champaign MSA	403	72,538	20.4	8,000	21.8	8.7	9.3	16.5	23.1	19.6	20.7	27.0	20.8	41.0	36.2	34.2	0.0	5.0	16.1	
Davenport MSA	74	10,453	3.8	8,182	21.4	10.8	13.0	19.4	25.7	22.5	22.2	17.6	20.8	37.1	35.1	25.3	0.0	10.8	18.5	
Peoria MSA	306	55,825	15.5	13,467	21.6	5.9	11.7	17.6	18.6	18.6	21.1	17.0	19.4	39.7	51.6	28.8	0.0	6.9	21.6	
Springfield MSA	139	23,103	7.0	9,173	22.5	10.1	11.6	16.2	23.0	20.5	20.7	18.7	19.5	40.6	43.9	30.0	0.0	4.3	18.4	
Total	1,973	337,245	100.0	61,874	21.5	8.4	11.3	17.3	21.7	19.7	21.1	24.7	20.8	40.0	41.2	29.1	0.0	4.1	19.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	305	42,044	29.2	9,074	21.8	18.0	12.3	17.2	27.5	22.5	19.5	23.6	22.4	41.5	27.2	25.6	0.0	3.6	17.2
Limited-Scope:																			
Bloomington MSA	192	40,686	18.4	4,793	21.0	19.8	15.9	16.9	23.4	22.1	22.4	28.6	20.2	39.7	26.0	20.5	0.0	2.1	21.3
Champaign MSA	162	39,180	15.5	4,695	22.7	13.0	11.2	16.8	26.5	20.9	20.3	23.5	19.7	40.2	33.3	28.3	0.0	3.7	19.8
Davenport MSA	54	7,269	5.2	5,677	21.6	16.7	15.7	19.2	38.9	26.3	21.9	25.9	20.2	37.2	18.5	19.9	0.0	0.0	17.9
Peoria MSA	216	35,243	20.7	8,906	20.0	14.8	15.1	18.7	30.1	20.8	21.2	20.4	18.0	40.1	29.6	21.7	0.0	5.1	24.5
Springfield MSA	117	18,986	11.2	5,687	23.5	16.2	14.3	15.8	34.2	19.1	21.0	18.8	18.2	39.7	29.1	27.2	0.0	1.7	21.1
Total	1,046	183,408	100.0	38,832	21.7	16.6	14.0	17.5	28.5	21.9	20.9	23.4	19.9	40.0	28.2	23.8	0.0	3.3	20.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Rockford MSA	1,356	33,603	31.0	6,042	9.2	6.3	9.0	15.8	14.7	16.1	28.6	30.8	29.0	44.1	45.6	43.1	2.3	2.7	2.7		
Limited-Scope:																					
Bloomington MSA	521	9,598	11.9	2,911	8.4	10.6	8.2	12.6	10.2	12.3	54.2	45.7	52.1	24.7	33.6	27.4	0.0	0.0	0.0		
Champaign MSA	775	14,444	17.7	3,530	10.2	8.9	10.7	17.0	13.0	15.1	42.8	45.3	45.8	27.8	31.0	27.5	2.2	1.8	0.9		
Davenport MSA	378	6,682	8.7	2,821	4.3	3.7	4.3	32.9	28.6	33.8	55.1	55.3	55.1	7.7	12.4	6.8	0.0	0.0	0.0		
Peoria MSA	704	16,404	16.1	5,621	12.5	10.7	12.0	13.5	7.2	12.3	41.3	39.6	41.6	32.7	42.5	34.1	0.0	0.0	0.0		
Springfield MSA	635	11,524	14.5	3,072	15.6	7.4	13.1	16.0	12.9	14.4	38.7	39.4	39.1	29.7	40.3	33.5	0.0	0.0	0.0		
Total	4,369	92,255	100.0	23,997	10.5	7.9	9.8	17.3	13.6	16.5	41.4	39.9	41.6	30.0	37.4	31.3	0.8	1.1	0.8		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	2,026	27,269	26.4	5,513	4.8	3.6	4.5	24.5	18.7	23.8	30.9	30.1	29.8	36.8	45.9	39.8	3.0	1.7	2.1
Limited-Scope:																			
Bloomington MSA	911	11,625	11.9	2,382	0.8	0.9	0.5	22.4	14.6	22.5	50.5	49.3	48.5	18.0	29.4	23.1	8.3	5.8	5.5
Champaign MSA	1,427	15,154	18.6	3,194	10.1	6.6	10.3	18.6	14.7	17.9	28.7	23.9	28.2	37.5	50.9	40.2	5.1	3.9	3.4
Davenport MSA	609	6,722	7.9	2,581	6.8	4.9	4.1	27.7	25.3	31.0	53.9	54.8	54.3	11.6	14.9	10.5	0.0	0.0	0.0
Peoria MSA	1,415	17,231	18.4	4,590	11.2	6.2	8.6	15.8	9.9	14.7	47.3	43.1	49.1	25.7	40.8	27.6	0.0	0.0	0.0
Springfield MSA	1,287	15,073	16.8	3,028	11.8	6.0	11.2	21.7	11.6	18.6	21.8	24.1	26.6	44.7	58.4	43.6	0.0	0.0	0.0
Total	7,675	93,074	100.0	21,288	8.1	4.8	6.7	21.5	15.2	20.9	36.9	34.6	38.3	31.3	43.5	32.4	2.3	1.9	1.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rockford MSA	1,356	33,603	31.0	6,042	82.5	56.2	44.1	5.9	19.8	11.6	24.0
Limited-Scope:											
Bloomington MSA	521	9,598	11.9	2,911	81.6	62.8	43.9	4.8	13.6	13.5	23.6
Champaign MSA	775	14,444	17.7	3,530	81.8	64.6	45.6	4.3	11.4	13.9	24.0
Davenport MSA	378	6,682	8.7	2,821	79.4	64.3	47.6	5.6	19.8	15.0	15.9
Peoria MSA	704	16,404	16.1	5,621	80.1	58.4	49.7	5.9	20.5	14.0	21.2
Springfield MSA	635	11,524	14.5	3,072	79.1	59.8	54.8	5.2	20.9	15.7	19.2
Total	4,369	92,255	100.0	23,997	80.8	60.1	47.4	5.4	17.9	13.8	22.1
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rockford MSA	2,026	27,269	26.4	5,513	86.1	69.0	52.9	4.4	18.9	9.5	12.1
Limited-Scope:											
Bloomington MSA	911	11,625	11.9	2,382	84.8	73.3	51.1	3.7	12.4	11.5	14.3
Champaign MSA	1,427	15,154	18.6	3,194	85.5	75.3	52.9	3.2	10.4	11.3	14.2
Davenport MSA	609	6,722	7.9	2,581	82.8	73.2	56.2	4.5	17.1	12.7	9.7
Peoria MSA	1,415	17,231	18.4	4,590	83.6	68.3	50.5	4.6	17.0	11.8	14.7
Springfield MSA	1,287	15,073	16.8	3,028	86.2	74.0	54.1	3.3	14.0	10.6	12.0
Total	7,675	93,074	100.0	21,288	85.0	71.7	52.8	4.0	15.2	11.0	13.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography

2020-2021

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	17	166	11.8	170	4.4	0.0	0.0	12.3	5.9	2.4	31.8	64.7	40.0	50.8	29.4	57.6	0.8	0.0	0.0
Limited-Scope:																			
Bloomington MSA	18	178	12.5	587	1.7	0.0	0.3	7.1	0.0	0.7	68.6	55.6	81.8	22.6	44.4	17.2	0.0	0.0	0.0
Champaign MSA	29	276	20.1	292	2.6	0.0	0.3	5.7	3.4	3.1	68.8	86.2	74.7	22.8	10.3	21.9	0.1	0.0	0.0
Davenport MSA	21	198	14.6	177	0.2	0.0	0.0	11.4	0.0	4.0	78.6	90.5	85.9	9.7	9.5	10.2	0.0	0.0	0.0
Peoria MSA	35	368	24.3	563	2.7	0.0	0.7	6.8	0.0	0.2	49.3	42.9	57.4	41.2	57.1	41.7	0.0	0.0	0.0
Springfield MSA	24	252	16.7	252	5.6	0.0	0.0	7.0	0.0	1.2	54.3	75.0	77.0	33.1	25.0	21.8	0.0	0.0	0.0
Total	144	1,438	100.0	2,041	2.9	0.0	0.3	8.4	1.4	1.4	58.2	68.1	70.3	30.5	30.6	28.0	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Rockford MSA	48	404	16.1	162	3.4	0.0	0.0	16.8	6.3	5.6	20.9	10.4	6.8	58.1	83.3	87.0	0.8	0.0	0.6
Limited-Scope:																			
Bloomington MSA	50	529	16.8	357	0.3	0.0	0.0	17.5	12.0	21.0	63.8	70.0	70.6	15.8	18.0	8.1	2.7	0.0	0.3
Champaign MSA	54	580	18.1	220	2.8	1.9	0.0	13.1	3.7	5.0	48.9	37.0	62.7	34.5	57.4	32.3	0.7	0.0	0.0
Davenport MSA	41	357	13.8	187	2.7	0.0	1.1	9.1	9.8	7.0	65.2	75.6	52.4	23.0	14.6	39.6	0.0	0.0	0.0
Peoria MSA	59	530	19.8	331	3.0	1.7	1.2	13.3	3.4	11.8	57.7	86.4	64.0	25.9	8.5	23.0	0.0	0.0	0.0
Springfield MSA	46	602	15.4	163	5.4	0.0	0.6	11.1	0.0	2.5	45.7	63.0	68.1	37.7	37.0	28.8	0.0	0.0	0.0
Total	298	3,002	100.0	1,420	3.0	0.7	0.5	13.4	5.7	10.6	50.0	57.4	57.9	33.0	36.2	30.8	0.6	0.0	0.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rockford MSA	17	166	11.8	170	96.0	70.6	47.6	2.5	5.9	1.5	23.5
Limited-Scope:											
Bloomington MSA	18	178	12.5	587	96.9	94.4	69.0	1.5	0.0	1.5	5.6
Champaign MSA	29	276	20.1	292	96.6	48.3	51.4	1.2	3.4	2.2	48.3
Davenport MSA	21	198	14.6	177	98.2	52.4	59.9	1.0	19.0	0.9	28.6
Peoria MSA	35	368	24.3	563	96.6	65.7	78.7	1.9	8.6	1.6	25.7
Springfield MSA	24	252	16.7	252	97.1	62.5	50.0	0.9	20.8	2.0	16.7
Total	144	1,438	100.0	2,041	96.9	63.9	64.2	1.5	9.7	1.6	26.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rockford MSA	48	404	16.1	162	97.2	68.8	59.9	1.7	18.8	1.0	12.5
Limited-Scope:											
Bloomington MSA	50	529	16.8	357	97.5	90.0	63.3	1.3	2.0	1.3	8.0
Champaign MSA	54	580	18.1	220	97.5	68.5	48.6	0.8	13.0	1.7	18.5
Davenport MSA	41	357	13.8	187	98.3	41.5	47.1	0.9	19.5	0.9	39.0
Peoria MSA	59	530	19.8	331	97.0	72.9	67.1	1.6	5.1	1.4	22.0
Springfield MSA	46	602	15.4	163	97.9	76.1	55.2	0.9	21.7	1.1	2.2
Total	298	3,002	100.0	1,420	97.5	70.5	58.5	1.2	12.8	1.3	16.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis CSA	9,906	2,162,052	72.6	144,348	6.0	3.5	4.4	17.3	11.2	13.9	38.3	27.3	34.7	38.4	58.0	46.9	0.1	0.0	0.1
Limited-Scope:																			
Bloomington CSA	466	91,673	3.4	8,396	2.1	3.2	1.9	8.5	9.4	10.6	59.6	41.2	54.0	29.8	46.1	33.6	0.0	0.0	0.0
Elkhart MSA	515	87,954	3.8	9,517	0.4	0.4	0.3	12.3	8.5	10.4	63.7	60.8	65.1	23.7	30.3	24.2	0.0	0.0	0.0
Fort Wayne MSA	1,577	261,322	11.6	26,264	5.4	1.4	2.0	13.2	10.8	11.9	49.9	40.5	46.1	31.5	47.3	40.0	0.1	0.0	0.1
Lafayette MSA	509	91,688	3.7	8,969	1.1	0.2	1.0	16.2	11.6	14.2	35.3	31.8	33.6	47.3	56.4	51.0	0.1	0.0	0.2
South Bend MSA	615	113,125	4.5	13,294	4.9	2.6	3.8	15.0	7.8	10.5	44.4	44.7	46.8	35.7	44.9	38.9	0.0	0.0	0.0
Non-MSA IN	56	5,979	0.4	2,284	2.1	0.0	1.2	30.9	37.5	30.2	59.9	58.9	60.4	7.1	3.6	8.2	0.0	0.0	0.0
Total	13,644	2,813,793	100.0	213,072	5.0	3.0	3.6	16.0	11.0	13.3	43.3	31.6	39.2	35.6	54.4	43.8	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis CSA	2,921	701,040	64.6	88,199	4.6	5.7	4.4	16.2	16.2	15.0	43.2	38.9	43.6	35.1	38.4	36.2	0.9	0.8	0.8	
Limited-Scope:																				
Bloomington CSA	185	41,651	4.1	5,423	1.5	2.2	2.3	13.7	13.0	12.9	48.2	40.5	46.5	35.3	41.1	37.2	1.3	3.2	1.2	
Elkhart MSA	208	36,340	4.6	6,645	2.3	1.4	2.4	16.9	22.1	14.9	53.5	55.3	51.7	27.3	21.2	31.0	0.0	0.0	0.0	
Fort Wayne MSA	597	110,620	13.2	16,682	2.8	2.3	1.8	16.7	15.2	13.9	50.1	45.4	46.6	30.2	36.7	37.6	0.1	0.3	0.1	
Lafayette MSA	199	41,926	4.4	5,313	2.8	3.5	3.2	12.4	20.1	14.0	45.4	36.7	42.9	39.4	39.7	39.8	0.0	0.0	0.1	
South Bend MSA	341	65,947	7.5	8,761	4.1	4.4	2.9	18.5	27.0	18.9	38.9	32.8	38.1	38.1	35.5	39.7	0.4	0.3	0.4	
Non-MSA IN	68	8,564	1.5	1,638	7.7	5.9	5.0	18.2	13.2	15.0	61.5	60.3	64.9	12.6	20.6	15.1	0.0	0.0	0.0	
Total	4,519	1,006,088	100.0	132,661	4.0	4.7	3.8	16.2	17.2	15.0	45.1	40.3	44.3	34.0	37.1	36.3	0.7	0.7	0.6	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis CSA	9,906	2,162,052	72.6	144,348	21.9	9.2	8.2	17.3	23.3	18.9	19.8	21.5	20.5	41.1	42.4	34.1	0.0	3.6	18.2	
Limited-Scope:																				
Bloomington CSA	466	91,673	3.4	8,396	21.2	9.0	6.1	16.8	18.9	17.2	20.6	21.0	21.4	41.4	47.9	37.8	0.0	3.2	17.6	
Elkhart MSA	515	87,954	3.8	9,517	19.0	10.7	7.0	18.1	29.5	21.7	23.4	22.9	25.6	39.5	32.4	32.2	0.0	4.5	13.4	
Fort Wayne MSA	1,577	261,322	11.6	26,264	19.8	10.8	8.9	18.0	29.3	21.4	22.0	19.7	21.5	40.2	36.3	32.7	0.0	3.8	15.5	
Lafayette MSA	509	91,688	3.7	8,969	20.5	9.0	8.3	15.7	23.2	19.3	23.0	25.3	22.0	40.8	40.5	34.7	0.0	2.0	15.6	
South Bend MSA	615	113,125	4.5	13,294	22.1	10.2	13.5	16.7	25.2	23.3	20.1	23.6	20.5	41.2	37.9	28.8	0.0	3.1	13.8	
Non-MSA IN	56	5,979	0.4	2,284	25.4	14.3	13.1	19.8	23.2	23.4	19.6	30.4	21.5	35.1	26.8	26.3	0.0	5.4	15.8	
Total	13,644	2,813,793	100.0	213,072	21.4	9.5	8.6	17.3	24.2	19.6	20.5	21.6	21.0	40.8	41.2	33.6	0.0	3.6	17.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis CSA	2,921	701,040	64.6	88,199	20.6	15.3	10.7	17.8	25.7	22.0	21.0	22.3	21.4	40.6	32.7	30.7	0.0	4.0	15.3
Limited-Scope:																			
Bloomington CSA	185	41,651	4.1	5,423	18.5	17.3	10.8	17.0	19.5	19.7	21.3	23.2	22.1	43.1	34.6	30.9	0.0	5.4	16.6
Elkhart MSA	208	36,340	4.6	6,645	19.2	18.3	11.3	18.5	30.3	24.8	22.7	25.0	26.3	39.7	23.1	24.8	0.0	3.4	12.8
Fort Wayne MSA	597	110,620	13.2	16,682	18.7	17.3	11.4	18.9	29.0	23.2	23.0	24.5	22.6	39.5	26.3	30.0	0.0	3.0	12.8
Lafayette MSA	199	41,926	4.4	5,313	20.9	11.6	8.8	16.7	25.6	20.3	20.6	22.6	21.9	41.7	37.7	36.3	0.0	2.5	12.7
South Bend MSA	341	65,947	7.5	8,761	20.4	17.3	15.3	17.2	30.2	20.9	22.0	19.4	21.4	40.4	30.8	29.8	0.0	2.3	12.7
Non-MSA IN	68	8,564	1.5	1,638	24.7	26.5	17.1	18.2	41.2	28.2	22.6	14.7	19.2	34.5	17.6	24.3	0.0	0.0	11.2
Total	4,519	1,006,088	100.0	132,661	20.2	16.0	11.1	17.9	26.7	22.1	21.4	22.4	21.8	40.5	31.3	30.4	0.0	3.6	14.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Indianapolis CSA	14,504	378,621	71.6	48,604	10.7	5.7	8.1	20.5	13.3	16.8	31.5	29.1	32.9	37.0	51.8	42.0	0.3	0.2	0.2		
Limited-Scope:																					
Bloomington CSA	937	22,322	4.6	2,928	4.8	6.6	5.5	20.9	20.0	19.7	42.9	39.5	44.4	30.2	33.6	30.3	1.2	0.3	0.1		
Elkhart MSA	845	30,225	4.2	3,338	1.2	1.7	1.1	16.7	15.0	13.5	62.8	65.2	66.0	19.4	18.1	19.4	0.0	0.0	0.0		
Fort Wayne MSA	2,300	71,512	11.3	8,289	7.3	4.9	6.7	17.5	14.7	16.3	40.7	40.7	42.0	30.7	37.2	31.1	3.8	2.5	3.9		
Lafayette MSA	698	15,137	3.4	2,668	4.2	3.7	3.1	28.3	20.5	31.1	27.5	28.2	26.7	36.1	43.7	37.0	3.9	3.9	2.1		
South Bend MSA	828	19,808	4.1	4,935	12.1	6.3	10.1	17.8	12.9	15.9	41.9	44.4	42.5	28.3	36.4	31.5	0.0	0.0	0.0		
Non-MSA IN	159	2,339	0.8	1,078	11.7	11.3	9.9	29.2	13.8	27.3	53.8	73.0	57.3	5.3	1.9	5.5	0.0	0.0	0.0		
Total	20,271	539,964	100.0	71,840	9.5	5.5	7.5	20.2	14.1	17.3	35.4	33.3	36.7	34.1	46.6	37.7	0.8	0.6	0.7		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Indianapolis CSA	22,742	300,924	71.5	47,619	8.2	4.0	5.3	19.6	12.5	16.1	36.0	35.1	39.5	33.2	47.1	37.0	3.0	1.3	2.1
Limited-Scope:																			
Bloomington CSA	1,370	16,641	4.3	2,676	10.5	9.3	10.7	14.9	12.1	13.2	38.5	36.4	41.7	31.6	38.2	32.0	4.5	3.9	2.5
Elkhart MSA	1,272	21,757	4.0	3,265	3.0	2.1	1.5	19.9	19.0	17.8	53.7	52.9	54.3	23.4	25.9	26.4	0.0	0.0	0.0
Fort Wayne MSA	3,434	49,609	10.8	7,806	4.2	2.5	3.0	17.5	14.2	17.9	46.1	40.4	43.6	28.5	40.4	31.6	3.8	2.4	3.9
Lafayette MSA	1,243	14,087	3.9	2,374	8.5	5.6	7.9	23.1	15.0	22.5	35.5	39.9	37.4	29.0	36.3	30.2	4.0	3.1	2.0
South Bend MSA	1,496	18,847	4.7	4,226	6.4	2.3	5.0	25.8	18.1	22.9	35.1	36.0	36.3	32.0	43.4	35.2	0.7	0.2	0.6
Non-MSA IN	250	2,581	0.8	911	16.4	12.4	13.3	16.4	10.4	16.4	50.9	49.2	51.8	16.3	28.0	18.6	0.0	0.0	0.0
Total	31,807	424,446	100.0	68,877	7.5	4.0	5.2	19.7	13.3	16.9	38.2	36.8	40.7	31.7	44.4	35.1	2.9	1.5	2.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Indianapolis CSA	14,504	378,621	71.6	48,604	89.0	60.9	46.3	3.5	14.9	7.6	24.2
Limited-Scope:											
Bloomington CSA	937	22,322	4.6	2,928	86.6	61.7	39.7	3.7	13.0	9.7	25.3
Elkhart MSA	845	30,225	4.2	3,338	83.6	52.0	40.8	6.2	24.6	10.3	23.4
Fort Wayne MSA	2,300	71,512	11.3	8,289	85.7	59.0	46.5	4.5	17.9	9.8	23.2
Lafayette MSA	698	15,137	3.4	2,668	86.1	65.8	46.0	3.5	13.3	10.4	20.9
South Bend MSA	828	19,808	4.1	4,935	85.2	62.9	46.0	4.3	17.8	10.5	19.3
Non-MSA IN	159	2,339	0.8	1,078	82.7	62.3	50.6	4.6	19.5	12.7	18.2
Total	20,271	539,964	100.0	71,840	87.8	60.6	45.8	3.8	15.6	8.4	23.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Indianapolis CSA	22,742	300,924	71.5	47,619	91.8	73.3	51.2	2.5	15.0	5.8	11.6
Limited-Scope:											
Bloomington CSA	1,370	16,641	4.3	2,676	89.2	74.2	47.9	2.8	12.4	7.9	13.4
Elkhart MSA	1,272	21,757	4.0	3,265	86.9	63.8	49.0	4.8	24.0	8.3	12.3
Fort Wayne MSA	3,434	49,609	10.8	7,806	89.4	71.2	52.4	3.2	18.7	7.4	10.1
Lafayette MSA	1,243	14,087	3.9	2,374	89.1	70.1	52.8	2.5	15.2	8.5	14.7
South Bend MSA	1,496	18,847	4.7	4,226	88.5	71.9	51.2	3.1	17.0	8.3	11.0
Non-MSA IN	250	2,581	0.8	911	85.9	69.6	55.5	3.7	16.8	10.4	13.6
Total	31,807	424,446	100.0	68,877	90.8	72.5	51.2	2.7	15.8	6.5	11.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis CSA	181	2,573	59.5	1,022	5.5	1.7	0.4	12.8	6.1	3.5	48.2	56.9	71.9	33.3	35.4	24.2	0.1	0.0	0.0	
Limited-Scope:																				
Bloomington CSA	13	106	4.3	47	1.4	7.7	0.0	5.9	7.7	6.4	65.0	61.5	78.7	27.4	23.1	14.9	0.2	0.0	0.0	
Elkhart MSA	17	273	5.6	128	0.2	0.0	0.0	7.1	0.0	5.5	61.9	47.1	59.4	30.9	52.9	35.2	0.0	0.0	0.0	
Fort Wayne MSA	35	619	11.5	399	2.6	2.9	0.3	8.1	11.4	2.5	58.6	54.3	74.7	29.9	31.4	22.6	0.7	0.0	0.0	
Lafayette MSA	40	1,032	13.2	96	1.8	0.0	1.0	13.3	10.0	4.2	35.9	52.5	47.9	49.0	37.5	46.9	0.0	0.0	0.0	
South Bend MSA	7	66	2.3	110	4.2	0.0	0.0	11.2	14.3	2.7	41.7	14.3	30.9	42.9	71.4	66.4	0.0	0.0	0.0	
Non-MSA IN	11	126	3.6	238	0.3	0.0	0.0	9.6	0.0	0.8	70.3	72.7	87.0	19.8	27.3	12.2	0.0	0.0	0.0	
Total	304	4,795	100.0	2,040	4.2	1.6	0.3	11.3	6.9	3.2	50.9	55.3	70.2	33.4	36.2	26.3	0.2	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Indianapolis CSA	337	3,368	58.1	846	5.0	3.0	0.4	14.4	9.5	6.1	49.1	55.8	67.6	30.4	31.5	25.8	1.0	0.3	0.1	
Limited-Scope:																				
Bloomington CSA	35	353	6.0	62	1.9	0.0	0.0	10.6	14.3	8.1	53.9	14.3	45.2	33.0	71.4	45.2	0.6	0.0	1.6	
Elkhart MSA	42	587	7.2	119	1.5	0.0	1.7	11.7	0.0	2.5	46.2	40.5	63.9	40.6	59.5	31.9	0.0	0.0	0.0	
Fort Wayne MSA	76	905	13.1	318	1.5	1.3	0.3	11.0	5.3	0.9	57.6	63.2	71.7	29.1	25.0	26.4	0.8	5.3	0.6	
Lafayette MSA	53	616	9.1	98	3.3	3.8	1.0	11.2	1.9	1.0	41.7	41.5	41.8	43.1	52.8	56.1	0.8	0.0	0.0	
South Bend MSA	20	224	3.4	92	4.2	0.0	1.1	17.4	5.0	0.0	45.6	50.0	56.5	32.5	40.0	42.4	0.3	5.0	0.0	
Non-MSA IN	17	167	2.9	167	1.9	0.0	0.0	8.1	0.0	1.8	70.1	64.7	82.6	19.9	35.3	15.6	0.0	0.0	0.0	
Total	580	6,220	100.0	1,702	4.0	2.2	0.5	13.4	7.4	3.9	50.3	51.9	66.7	31.4	37.4	28.7	0.8	1.0	0.2	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Indianapolis CSA	181	2,573	59.5	1,022	97.2	66.3	54.5	1.6	13.8	1.3	19.9
Limited-Scope:											
Bloomington CSA	13	106	4.3	47	97.8	61.5	51.1	1.6	15.4	0.5	23.1
Elkhart MSA	17	273	5.6	128	97.9	52.9	40.6	1.4	23.5	0.8	23.5
Fort Wayne MSA	35	619	11.5	399	97.6	51.4	53.1	1.3	11.4	1.1	37.1
Lafayette MSA	40	1,032	13.2	96	96.9	50.0	47.9	1.6	32.5	1.5	17.5
South Bend MSA	7	66	2.3	110	97.2	42.9	48.2	2.3	14.3	0.5	42.9
Non-MSA IN	11	126	3.6	238	98.7	54.5	87.8	1.0	18.2	0.3	27.3
Total	304	4,795	100.0	2,040	97.3	60.5	56.5	1.6	16.8	1.1	22.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Indianapolis CSA	337	3,368	58.1	846	97.7	67.4	50.4	1.2	13.1	1.0	19.6
Limited-Scope:											
Bloomington CSA	35	353	6.0	62	98.1	80.0	51.6	1.4	11.4	0.6	8.6
Elkhart MSA	42	587	7.2	119	98.1	69.0	55.5	0.9	16.7	0.9	14.3
Fort Wayne MSA	76	905	13.1	318	97.7	76.3	64.2	1.3	10.5	1.0	13.2
Lafayette MSA	53	616	9.1	98	97.5	50.9	41.8	1.3	18.9	1.3	30.2
South Bend MSA	20	224	3.4	92	97.9	60.0	72.8	1.7	20.0	0.4	20.0
Non-MSA IN	17	167	2.9	167	98.9	76.5	85.6	0.5	11.8	0.5	11.8
Total	580	6,220	100.0	1,702	97.8	67.9	57.5	1.2	13.6	1.0	18.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Des Moines CSA	621	152,917	85.7	42,888	2.8	0.8	1.6	18.8	9.7	13.0	41.4	37.5	38.6	37.0	52.0	46.8	0.0	0.0	0.0
Limited-Scope:																			
Cedar Rapids CSA	104	19,316	14.3	28,183	0.6	0.0	0.7	16.6	11.5	14.7	57.6	58.7	55.4	25.0	29.8	29.0	0.1	0.0	0.1
Total	725	172,233	100.0	71,071	1.9	0.7	1.3	17.9	9.9	13.7	48.1	40.6	45.3	32.1	48.8	39.7	0.1	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Des Moines CSA	304	70,972	80.4	24,774	3.4	4.6	3.2	17.9	24.3	16.5	46.8	42.8	43.8	31.5	27.6	36.1	0.4	0.7	0.4
Limited-Scope:																			
Cedar Rapids CSA	74	15,883	19.6	17,021	0.7	2.7	1.1	19.5	18.9	20.4	47.4	51.4	46.1	32.3	25.7	32.1	0.2	1.4	0.3
Total	378	86,855	100.0	41,795	2.3	4.2	2.3	18.6	23.3	18.1	47.1	44.4	44.7	31.8	27.2	34.5	0.3	0.8	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Des Moines CSA	621	152,917	85.7	42,888	20.7	6.9	8.1	17.1	20.3	18.5	21.6	27.7	20.5	40.6	42.5	32.4	0.0	2.6	20.5	
Limited-Scope:																				
Cedar Rapids CSA	104	19,316	14.3	28,183	18.7	6.7	10.2	17.5	21.2	19.5	23.6	24.0	19.9	40.2	39.4	26.0	0.0	8.7	24.4	
Total	725	172,2323	100.0	71,071	20.0	6.9	8.9	17.3	20.4	18.9	22.4	27.2	20.3	40.4	42.1	29.8	0.0	3.4	22.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Des Moines CSA	304	70,972	80.4	24,774	19.9	17.4	11.0	17.8	38.5	22.0	21.6	20.1	21.3	40.7	22.7	29.7	0.0	1.3	16.0
Limited-Scope:																			
Cedar Rapids CSA	74	15,883	19.6	17,021	19.2	9.5	11.1	18.3	35.1	21.9	22.3	25.7	21.1	40.2	25.7	27.9	0.0	4.1	18.0
Total	378	86,855	100.0	41,795	19.6	15.9	11.0	18.0	37.8	21.9	21.9	21.2	21.2	40.5	23.3	29.0	0.0	1.9	16.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Des Moines CSA	1,752	18,983	65.7	12,617	3.9	1.6	3.1	13.5	10.5	11.8	46.2	42.0	45.4	36.4	45.9	39.7	0.1	0.0	0.0		
Limited-Scope:																					
Cedar Rapids CSA	913	10,105	34.3	7,678	4.6	5.1	5.4	18.9	14.0	17.9	49.4	49.2	51.1	24.0	30.3	23.3	3.0	1.3	2.3		
Total	2,665	29,088	100.0	20,295	4.2	2.8	4.0	15.4	11.7	14.1	47.4	44.5	47.5	31.9	40.6	33.5	1.1	0.5	0.9		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Des Moines CSA	4,080	45,674	67.5	12,215	3.8	2.0	3.5	14.7	10.7	14.3	41.1	40.6	42.5	37.7	45.8	37.5	2.7	0.9	2.2		
Limited-Scope:																					
Cedar Rapids CSA	1,965	21,109	32.5	6,957	6.6	3.5	5.0	24.3	20.7	25.0	38.2	35.5	38.1	29.3	38.4	30.1	1.6	2.0	1.7		
Total	6,045	66,783	100.0	19,172	4.8	2.5	4.0	17.9	14.0	18.2	40.1	38.9	40.9	34.8	43.4	34.8	2.3	1.3	2.0		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Des Moines CSA	1,752	18,983	65.7	12,617	87.4	68.5	48.0	3.9	16.1	8.7	15.4
Limited-Scope:											
Cedar Rapids CSA	913	10,105	34.3	7,678	87.0	67.4	44.2	3.9	18.5	9.2	14.1
Total	2,665	29,088	100.0	20,295	87.2	68.1	46.6	3.9	16.9	8.9	15.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Des Moines CSA	4,080	45,674	67.5	12,215	91.2	71.8	49.5	2.5	15.3	6.3	12.8
Limited-Scope:											
Cedar Rapids CSA	1,965	21,109	32.5	6,957	90.0	69.7	50.7	2.7	16.0	7.2	14.3
Total	6,045	66,783	100.0	19,172	90.8	71.1	49.9	2.6	15.6	6.6	13.3
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Des Moines CSA	37	424	57.8	317	1.5	0.0	0.3	9.8	2.7	3.5	49.3	67.6	60.9	39.3	29.7	35.3	0.0	0.0	0.0
Limited-Scope:																			
Cedar Rapids CSA	27	288	42.2	662	1.0	0.0	0.2	8.6	3.7	1.7	63.1	55.6	89.4	26.9	40.7	8.8	0.4	0.0	0.0
Total	64	712	100.0	979	1.3	0.0	0.2	9.3	3.1	2.2	55.2	62.5	80.2	34.0	34.4	17.4	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Des Moines CSA	101	1,116	71.1	309	2.9	1.0	1.9	10.8	7.9	4.9	44.2	47.5	49.5	41.1	43.6	43.4	1.0	0.0	0.3	
Limited-Scope:																				
Cedar Rapids CSA	41	478	28.9	715	2.3	2.4	0.1	16.3	12.2	45.9	45.5	29.3	38.3	35.3	56.1	15.7	0.5	0.0	0.0	
Total	142	1,594	100.0	1,024	2.6	1.4	0.7	13.1	9.2	33.5	44.7	42.3	41.7	38.8	47.2	24.0	0.8	0.0	0.1	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Des Moines CSA	37	424	57.8	317	96.7	51.4	58.4	1.9	24.3	1.3	24.3
Limited-Scope:											
Cedar Rapids CSA	27	288	42.2	662	97.6	70.4	60.9	1.3	22.2	1.2	7.4
Total	64	712	100.0	979	97.1	59.4	60.1	1.7	23.4	1.2	17.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Des Moines CSA	101	1,116	71.1	309	98.0	78.2	52.8	1.2	10.9	0.8	10.9
Limited-Scope:											
Cedar Rapids CSA	41	478	28.9	715	98.3	80.5	59.7	0.9	9.8	0.9	9.8
Total	142	1,594	100.0	1,024	98.1	78.9	57.6	1.1	10.6	0.8	10.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Manhattan MSA	47	10,175	100.0	5,751	0.0	0.0	0.0	14.8	8.5	13.7	45.4	23.4	38.0	39.5	66.0	47.9	0.3	2.1	0.5
Total	47	10,175	100.0	5,751	0.0	0.0	0.0	14.8	8.5	13.7	45.4	23.4	38.0	39.5	66.0	47.9	0.3	2.1	0.5
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Manhattan MSA	33	6,816	100.0	3,659	2.9	3.0	4.0	12.4	18.2	13.5	39.1	27.3	40.9	45.5	48.5	41.0	0.2	3.0	0.4	
Total	33	6,816	100.0	3,659	2.9	3.0	4.0	12.4	18.2	13.5	39.1	27.3	40.9	45.5	48.5	41.0	0.2	3.0	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Manhattan MSA	47	10,175	100.0	5,751	19.5	0.0	3.5	21.6	17.0	13.8	20.9	14.9	20.6	38.0	59.6	32.2	0.0	8.5	29.8
Total	47	10,175	100.0	5,751	19.5	0.0	3.5	21.6	17.0	13.8	20.9	14.9	20.6	38.0	59.6	32.2	0.0	8.5	29.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Manhattan MSA	33	6,816	100.0	3,659	21.4	0.0	5.9	17.1	33.3	18.1	21.4	27.3	20.9	40.2	39.4	29.8	0.0	0.0	25.3
Total	33	6,816	100.0	3,659	21.4	0.0	5.9	17.1	33.3	18.1	21.4	27.3	20.9	40.2	39.4	29.8	0.0	0.0	25.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Manhattan MSA	2,941	33,438	100.0	32,010	11.6	4.7	9.8	14.7	11.7	14.8	38.7	41.1	40.6	34.6	42.5	34.5	0.4	0.1	0.2	
Total	2,941	33,438	100.0	32,010	11.6	4.7	9.8	14.7	11.7	14.8	38.7	41.1	40.6	34.6	42.5	34.5	0.4	0.1	0.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Manhattan MSA	482	4,630	100.0	1,416	7.0	5.6	4.7	11.2	8.1	11.6	42.5	35.7	42.4	38.8	50.2	41.2	0.5	0.4	0.1		
Total	482	4,630	100.0	1,416	7.0	5.6	4.7	11.2	8.1	11.6	42.5	35.7	42.4	38.8	50.2	41.2	0.5	0.4	0.1		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Manhattan MSA	260	2,709	100.0	1,491	80.1	67.3	43.5	4.8	19.6	15.1	13.1
Total	260	2,709	100.0	1,491	80.1	67.3	43.5	4.8	19.6	15.1	13.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Manhattan MSA	482	4,630	100.0	1,416	82.7	75.3	50.9	4.0	13.3	13.3	11.4
Total	482	4,630	100.0	1,416	82.7	75.3	50.9	4.0	13.3	13.3	11.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Manhattan MSA	12	105	100.0	99	0.0	0.0	0.0	15.7	41.7	28.3	40.8	33.3	36.4	43.5	25.0	35.4	0.0	0.0	0.0
Total	12	105	100.0	99	0.0	0.0	0.0	15.7	41.7	28.3	40.8	33.3	36.4	43.5	25.0	35.4	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Manhattan MSA	32	328	100.0	110	2.5	0.0	0.0	11.4	18.8	26.4	49.7	53.1	48.2	36.4	28.1	25.5	0.0	0.0	0.0
Total	32	328	100.0	110	2.5	0.0	0.0	11.4	18.8	26.4	49.7	53.1	48.2	36.4	28.1	25.5	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Manhattan MSA	12	105	100.0	99	95.8	83.3	48.5	1.6	16.7	2.6	0.0
Total	12	105	100.0	99	95.8	83.3	48.5	1.6	16.7	2.6	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Manhattan MSA	32	328	100.0	110	96.3	90.6	46.4	1.5	3.1	2.2	6.3
Total	32	328	100.0	110	96.3	90.6	46.4	1.5	3.1	2.2	6.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Lexington CSA	1,650	537,734	85.1	25,703	4.3	2.5	3.2	17.4	17.2	17.4	36.6	31.0	33.6	41.6	49.3	45.9	0.0	0.0	0.0
Limited-Scope:																			
Bowling Green CSA	145	32,466	7.5	6,873	2.8	0.7	2.4	11.4	5.5	10.4	34.1	33.8	29.5	51.3	60.0	57.4	0.4	0.0	0.4
Owensboro MSA	91	13,108	4.7	4,902	1.8	2.2	1.0	18.1	22.0	16.3	50.9	45.1	51.4	29.2	30.8	31.2	0.0	0.0	0.0
Non-MSA KY	53	9,037	2.7	1,106	0.0	0.0	0.0	0.0	0.0	0.0	56.0	62.3	58.5	44.0	37.7	41.5	0.0	0.0	0.0
Total	1,939	592,345	100.0	38,584	3.5	2.3	2.7	15.8	16.1	15.5	39.5	32.7	35.8	41.2	48.9	46.0	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Lexington CSA	593	154,016	78.5	15,054	3.2	3.4	3.5	14.9	16.5	13.7	38.3	36.3	39.2	43.2	43.5	43.0	0.4	0.3	0.6
Limited-Scope:																			
Bowling Green CSA	60	14,235	7.9	4,365	1.0	3.3	1.4	15.7	15.0	15.2	45.3	38.3	42.1	37.8	41.7	40.9	0.2	1.7	0.4
Owensboro MSA	62	10,576	8.2	3,356	0.0	0.0	0.0	16.6	17.7	15.5	57.9	56.5	60.0	24.7	25.8	23.4	0.8	0.0	1.1
Non-MSA KY	40	8,085	5.3	728	0.0	0.0	0.0	3.8	5.0	6.9	33.1	17.5	28.3	63.1	77.5	64.8	0.0	0.0	0.0
Total	755	186,912	100.0	23,503	2.2	2.9	2.5	14.8	15.9	14.0	42.4	37.1	42.4	40.2	43.7	40.5	0.4	0.4	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Lexington CSA	1,650	537,734	85.1	25,703	23.1	10.8	6.0	15.2	24.1	16.6	18.3	21.0	19.6	43.4	40.3	40.9	0.0	3.8	16.8	
Limited-Scope:																				
Bowling Green CSA	145	32,466	7.5	6,873	19.7	5.5	5.8	16.6	20.0	16.3	19.7	26.9	20.0	44.0	46.2	37.3	0.0	1.4	20.6	
Owensboro MSA	91	13,108	4.7	4,902	21.8	14.3	7.4	17.7	22.0	19.0	19.7	22.0	22.6	40.8	38.5	34.8	0.0	3.3	16.2	
Non-MSA KY	53	9,037	2.7	1,106	19.1	7.5	3.3	15.1	20.8	13.5	17.3	22.6	19.6	48.5	39.6	43.6	0.0	9.4	20.1	
Total	1,939	592,345	100.0	38,584	22.1	10.5	6.1	15.9	23.6	16.8	18.7	21.6	20.1	43.3	40.6	39.6	0.0	3.8	17.5	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Lexington CSA	593	154,016	78.5	15,054	21.4	13.8	7.0	15.7	22.6	17.1	19.4	18.4	20.7	43.4	41.0	39.5	0.0	4.2	15.7
Limited-Scope:																			
Bowling Green CSA	60	14,235	7.9	4,365	20.6	10.0	4.7	15.9	18.3	15.0	18.8	26.7	22.4	44.8	45.0	38.4	0.0	0.0	19.6
Owensboro MSA	62	10,576	8.2	3,356	21.7	11.3	8.6	17.6	22.6	22.1	19.8	25.8	22.9	41.0	32.3	30.6	0.0	8.1	15.8
Non-MSA KY	40	8,085	5.3	728	16.7	2.5	4.0	16.3	22.5	14.7	18.4	25.0	23.8	48.5	47.5	40.7	0.0	2.5	16.9
Total	755	186,912	100.0	23,503	21.1	12.7	6.7	16.1	22.3	17.4	19.3	20.0	21.4	43.5	40.9	38.1	0.0	4.1	16.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Lexington CSA	2,929	89,659	77.0	11,966	5.9	5.7	5.5	18.1	18.4	18.3	39.1	34.2	38.6	36.9	41.7	37.6	0.0	0.0	0.0		
Limited-Scope:																					
Bowling Green CSA	428	5,958	11.3	3,129	6.3	3.7	5.2	17.7	13.1	18.5	31.4	32.7	29.2	40.1	45.6	44.3	4.5	4.9	2.8		
Owensboro MSA	345	6,035	9.1	2,118	2.8	2.9	3.2	28.7	18.8	24.0	41.0	40.6	42.7	27.5	37.7	30.1	0.0	0.0	0.0		
Non-MSA KY	101	2,458	2.7	490	0.0	0.0	0.0	0.0	0.0	0.0	58.8	51.5	55.3	41.2	48.5	44.7	0.0	0.0	0.0		
Total	3,803	104,110	100.0	17,703	5.4	5.0	5.0	18.6	17.4	18.5	38.7	35.1	37.9	36.6	42.0	38.1	0.7	0.6	0.5		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Lexington CSA	4,157	65,514	74.1	11,097	4.8	4.3	4.8	17.5	13.0	15.2	34.4	34.6	36.7	37.8	44.7	39.3	5.5	3.3	4.0	
Limited-Scope:																				
Bowling Green CSA	841	9,695	15.0	3,290	4.6	3.7	3.0	18.5	13.4	17.9	39.2	36.0	39.8	33.6	44.8	36.4	4.1	2.0	2.8	
Owensboro MSA	458	5,172	8.2	1,879	0.0	0.0	0.0	22.3	17.0	21.5	47.6	43.0	46.7	23.3	36.9	26.8	6.8	3.1	5.0	
Non-MSA KY	153	2,029	2.7	495	0.0	0.0	0.0	24.1	21.6	20.2	24.1	16.3	20.6	51.8	62.1	59.2	0.0	0.0	0.0	
Total	5,609	82,410	100.0	16,761	4.1	3.8	3.8	18.4	13.7	16.6	36.2	35.0	38.0	36.1	44.6	37.9	5.2	3.0	3.8	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Lexington CSA	2,929	89,659	77.0	11,966	87.5	61.8	49.9	3.6	16.5	8.9	21.7
Limited-Scope:											
Bowling Green CSA	428	5,958	11.3	3,129	86.1	65.7	52.4	3.8	22.4	10.1	11.9
Owensboro MSA	345	6,035	9.1	2,118	83.7	62.6	54.0	4.7	18.3	11.7	19.1
Non-MSA KY	101	2,458	2.7	490	82.8	66.3	47.6	3.7	15.8	13.5	17.8
Total	3,803	104,110	100.0	17,703	86.7	62.4	50.7	3.8	17.3	9.5	20.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Lexington CSA	4,157	65,514	74.1	11,097	90.5	72.0	52.0	2.5	16.4	6.9	11.6
Limited-Scope:											
Bowling Green CSA	841	9,695	15.0	3,290	89.1	70.0	54.0	2.8	19.0	8.1	10.9
Owensboro MSA	458	5,172	8.2	1,879	86.9	69.0	56.9	3.5	13.8	9.5	17.2
Non-MSA KY	153	2,029	2.7	495	86.6	75.2	60.0	2.8	17.0	10.6	7.8
Total	5,609	82,410	100.0	16,761	89.8	71.5	53.2	2.7	16.6	7.5	11.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Lexington CSA	116	3,333	78.4	329	4.7	4.3	0.9	13.2	6.0	6.7	39.1	54.3	40.7	43.1	35.3	51.7	0.0	0.0	0.0	
Limited-Scope:																				
Bowling Green CSA	12	111	8.1	106	1.8	0.0	0.0	6.8	0.0	2.8	32.6	8.3	34.0	56.9	91.7	63.2	1.8	0.0	0.0	
Owensboro MSA	15	136	10.1	371	0.2	0.0	0.0	11.3	0.0	2.2	51.1	46.7	54.2	37.4	53.3	43.7	0.0	0.0	0.0	
Non-MSA KY	5	20	3.4	48	0.0	0.0	0.0	0.0	0.0	0.0	34.2	80.0	29.2	65.8	20.0	70.8	0.0	0.0	0.0	
Total	148	3,600	100.0	854	3.3	3.4	0.4	11.1	4.7	3.9	39.6	50.7	45.1	45.7	41.2	50.7	0.3	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Lexington CSA	138	4,612	71.1	279	3.3	0.7	2.9	12.4	5.8	5.0	41.0	42.0	47.0	40.0	43.5	41.9	3.3	8.0	3.2
Limited-Scope:																			
Bowling Green CSA	23	208	11.9	157	2.3	0.0	0.0	10.3	13.0	2.5	53.1	60.9	74.5	33.0	26.1	22.9	1.4	0.0	0.0
Owensboro MSA	24	192	12.4	259	0.0	0.0	0.0	7.6	0.0	0.4	57.5	50.0	46.7	33.4	50.0	52.5	1.5	0.0	0.4
Non-MSA KY	9	88	4.6	34	0.0	0.0	0.0	6.7	0.0	0.0	16.4	33.3	26.5	76.9	66.7	73.5	0.0	0.0	0.0
Total	194	5,100	100.0	729	2.5	0.5	1.1	11.0	5.7	2.6	44.2	44.8	51.9	39.7	43.3	43.1	2.5	5.7	1.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Lexington CSA	116	3,333	78.4	329	96.4	64.7	58.4	2.1	14.7	1.6	20.7
Limited-Scope:											
Bowling Green CSA	12	111	8.1	106	98.4	66.7	57.5	0.4	25.0	1.2	8.3
Owensboro MSA	15	136	10.1	371	98.4	86.7	70.9	1.1	13.3	0.5	0.0
Non-MSA KY	5	20	3.4	48	98.0	60.0	33.3	2.0	0.0	0.0	40.0
Total	148	3,600	100.0	854	97.1	66.9	62.3	1.6	14.9	1.2	18.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Lexington CSA	138	4,612	71.1	279	97.5	75.4	66.7	1.2	14.5	1.3	10.1
Limited-Scope:											
Bowling Green CSA	23	208	11.9	157	98.5	65.2	50.3	0.5	13.0	1.1	21.7
Owensboro MSA	24	192	12.4	259	98.9	91.7	54.8	0.9	4.2	0.2	4.2
Non-MSA KY	9	88	4.6	34	98.5	77.8	55.9	1.5	0.0	0.0	22.2
Total	194	5,100	100.0	729	97.9	76.3	58.4	1.1	12.4	1.0	11.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
New Orleans CSA	3,417	945,924	47.0	56,336	5.1	5.8	4.9	19.6	14.5	15.0	39.4	29.1	37.3	35.5	50.1	42.2	0.4	0.4	0.7
Limited-Scope:																			
Alexandria MSA	102	15,217	1.4	4,205	4.5	1.0	1.5	8.5	4.9	6.8	45.0	47.1	40.2	42.0	47.1	51.5	0.0	0.0	0.0
Baton Rouge MSA	1,427	352,648	19.6	33,362	4.4	1.4	1.3	18.6	14.5	12.9	35.6	24.0	36.2	41.4	60.1	49.6	0.0	0.0	0.0
Houma MSA	605	108,470	8.3	5,897	0.0	0.0	0.0	14.0	8.9	10.6	64.5	56.5	60.0	21.6	34.5	29.4	0.0	0.0	0.0
Lafayette CSA	835	150,481	11.5	19,247	3.5	1.4	1.7	21.0	12.7	13.2	48.0	37.7	42.3	27.4	48.1	42.7	0.0	0.0	0.0
Lake Charles CSA	297	60,716	4.1	7,328	2.9	0.7	1.4	18.7	10.8	15.3	41.5	30.0	40.2	36.9	58.6	43.1	0.0	0.0	0.0
Monroe CSA	230	38,238	3.2	7,061	8.5	1.7	3.2	11.5	10.0	5.5	21.9	22.6	22.9	58.1	65.7	68.4	0.0	0.0	0.0
Shreveport CSA	305	54,272	4.2	16,684	7.8	1.0	1.8	14.4	8.5	7.4	33.6	28.9	29.7	44.2	61.6	61.2	0.0	0.0	0.0
Non-MSA LA	55	7,970	0.8	2,804	0.0	0.0	0.0	0.0	0.0	0.0	40.3	34.5	37.9	59.7	65.5	62.1	0.0	0.0	0.0
Total	7,273	1,733,936	100.0	152,924	4.6	3.3	2.8	17.6	13.1	12.4	40.5	31.5	37.3	37.2	51.9	47.3	0.1	0.2	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
New Orleans CSA	1,228	328,629	43.3	33,493	5.4	5.5	5.0	21.4	18.2	18.3	34.9	31.8	33.6	37.3	43.3	42.0	0.9	1.1	1.1
Limited-Scope:																			
Alexandria MSA	63	9,030	2.2	2,758	3.1	0.0	2.0	18.7	15.9	13.3	34.7	34.9	36.0	43.6	49.2	48.7	0.0	0.0	0.0
Baton Rouge MSA	570	148,492	20.1	20,610	5.1	4.2	3.4	15.4	13.0	14.0	38.0	31.2	40.2	39.7	49.1	40.4	1.8	2.5	2.0
Houma MSA	198	32,869	7.0	3,938	2.3	2.0	2.7	15.3	13.6	12.3	48.3	40.9	47.5	32.6	41.9	35.0	1.5	1.5	2.5
Lafayette CSA	329	58,750	11.6	12,402	4.6	2.7	2.8	23.5	18.5	19.7	34.2	31.6	31.9	37.3	46.5	45.3	0.4	0.6	0.4
Lake Charles CSA	153	27,729	5.4	4,873	6.3	5.2	3.6	16.1	16.3	13.6	38.9	35.3	44.6	38.7	43.1	38.2	0.0	0.0	0.0
Monroe CSA	120	22,743	4.2	4,456	9.7	9.2	5.9	9.3	9.2	7.0	26.5	25.0	30.9	53.9	55.8	55.2	0.6	0.8	0.9
Shreveport CSA	154	24,635	5.4	9,857	3.5	1.3	1.8	18.5	17.5	13.2	33.2	31.2	32.3	42.7	48.7	51.7	2.1	1.3	1.0
Non-MSA LA	23	3,729	0.8	1,846	0.0	0.0	0.0	0.0	0.0	0.0	22.7	34.8	26.5	77.3	65.2	73.5	0.0	0.0	0.0
Total	2,838	656,606	100.0	94,233	4.9	4.4	3.7	18.6	16.1	15.5	35.6	32.3	35.6	39.9	45.9	44.1	1.0	1.3	1.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
New Orleans CSA	3,417	945,924	47.0	56,336	25.1	5.2	4.1	15.8	16.2	14.0	17.3	19.3	18.2	41.9	53.5	40.6	0.0	5.8	23.2	
Limited-Scope:																				
Alexandria MSA	102	15,217	1.4	4,205	23.8	3.9	4.2	16.4	19.6	13.2	17.9	25.5	18.6	41.9	38.2	38.4	0.0	12.7	25.6	
Baton Rouge MSA	1,427	352,648	19.6	33,362	23.3	6.7	6.5	16.2	19.6	18.2	18.0	16.8	18.6	42.6	50.1	35.4	0.0	6.8	21.2	
Houma MSA	605	108,470	8.3	5,897	22.7	7.3	5.4	16.2	18.2	16.2	18.7	20.0	19.6	42.4	47.3	33.9	0.0	7.3	24.8	
Lafayette CSA	835	150,481	11.5	19,247	25.3	6.7	6.0	16.0	17.0	15.7	16.7	18.9	19.0	42.0	47.2	38.0	0.0	10.2	21.4	
Lake Charles CSA	297	60,716	4.1	7,328	23.7	5.7	4.9	16.8	12.8	14.0	17.9	17.8	17.7	41.6	54.2	34.6	0.0	9.4	28.9	
Monroe CSA	230	38,238	3.2	7,061	25.0	5.7	2.4	15.7	12.6	9.4	15.3	17.4	16.0	44.1	47.0	43.3	0.0	17.4	29.0	
Shreveport CSA	305	54,272	4.2	16,684	24.3	5.9	3.7	15.2	18.7	12.3	16.7	19.7	16.7	43.8	45.2	34.2	0.0	10.5	33.0	
Non-MSA LA	55	7,970	0.8	2,804	16.8	1.8	1.8	15.4	12.7	6.2	18.4	10.9	14.3	49.4	67.3	45.9	0.0	7.3	31.8	
Total	7,273	1,733,936	100.0	152,924	24.2	5.8	4.8	15.9	17.0	14.6	17.3	18.7	18.1	42.5	51.0	38.1	0.0	7.5	24.4	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
New Orleans CSA	1,228	328,629	43.3	33,493	25.0	9.5	5.3	15.3	20.0	16.8	18.1	21.9	20.4	41.6	41.5	36.5	0.0	7.0	20.9	
Limited-Scope:																				
Alexandria MSA	63	9,030	2.2	2,758	22.6	12.7	4.6	17.0	30.2	14.9	18.2	27.0	18.3	42.2	25.4	37.0	0.0	4.8	25.2	
Baton Rouge MSA	570	148,492	20.1	20,610	23.0	11.6	8.6	15.8	20.4	20.9	17.9	18.1	20.1	43.3	44.6	30.6	0.0	5.4	19.8	
Houma MSA	198	32,869	7.0	3,938	23.9	10.1	4.8	17.1	27.3	16.9	17.8	22.7	22.3	41.3	32.8	33.2	0.0	7.1	22.8	
Lafayette CSA	329	58,750	11.6	12,402	25.9	9.1	6.4	15.0	19.1	17.8	17.7	28.6	20.4	41.4	36.2	34.5	0.0	7.0	20.8	
Lake Charles CSA	153	27,729	5.4	4,873	23.6	11.1	5.3	16.7	21.6	15.3	17.8	22.2	18.1	41.9	42.5	34.6	0.0	2.6	26.8	
Monroe CSA	120	22,743	4.2	4,456	24.3	3.3	2.0	15.3	19.2	9.4	16.2	20.8	15.8	44.2	45.0	42.3	0.0	11.7	30.5	
Shreveport CSA	154	24,635	5.4	9,857	24.7	7.1	3.7	14.7	25.3	13.5	17.7	17.5	18.7	42.9	41.6	36.1	0.0	8.4	28.0	
Non-MSA LA	23	3,729	0.8	1,846	16.2	0.0	1.8	14.1	4.3	8.8	17.9	4.3	17.4	51.9	82.6	49.3	0.0	8.7	22.6	
Total	2,838	656,606	100.0	94,233	24.3	9.6	5.8	15.5	20.9	16.9	17.8	21.7	19.8	42.4	41.1	35.2	0.0	6.7	22.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
New Orleans CSA	11,921	328,458	48.3	49,119	8.7	7.7	8.7	20.6	16.1	20.1	30.7	27.2	29.9	38.8	47.9	40.2	1.1	1.1	1.1	
Limited-Scope:																				
Alexandria MSA	401	6,732	1.6	2,901	9.8	6.2	8.1	10.5	9.0	10.0	45.0	49.9	47.4	34.3	34.4	34.4	0.3	0.5	0.2	
Baton Rouge MSA	4,812	158,310	19.5	22,210	6.4	3.4	5.2	20.7	16.0	19.7	28.9	26.1	29.3	43.9	54.5	45.7	0.0	0.0	0.0	
Houma MSA	818	16,824	3.3	5,675	0.0	0.0	0.0	18.8	13.9	20.9	55.5	52.8	54.0	25.7	33.3	25.1	0.0	0.0	0.0	
Lafayette CSA	3,419	85,069	13.9	18,062	6.2	4.6	5.8	20.2	13.5	18.6	42.0	39.6	43.2	31.5	42.3	32.4	0.1	0.0	0.0	
Lake Charles CSA	1,172	36,077	4.8	5,454	5.0	6.9	5.8	26.6	20.8	25.9	32.5	28.9	30.2	35.7	43.2	38.0	0.2	0.2	0.1	
Monroe CSA	691	16,046	2.8	6,141	15.1	12.0	15.6	12.1	9.8	10.3	20.3	16.6	18.8	52.3	61.5	55.2	0.1	0.0	0.1	
Shreveport CSA	1,274	37,544	5.2	9,452	15.1	11.9	16.0	19.7	17.3	19.1	26.9	29.3	28.4	38.3	41.4	36.4	0.1	0.0	0.1	
Non-MSA LA	155	2,509	0.6	1,029	0.0	0.0	0.0	0.0	0.0	0.0	49.3	54.2	47.2	50.7	45.8	52.8	0.0	0.0	0.0	
Total	24,663	687,569	100.0	120,043	8.2	6.4	7.9	19.7	15.6	19.1	32.9	30.0	32.8	38.8	47.5	39.6	0.5	0.5	0.5	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
New Orleans CSA	16,445	246,018	47.6	43,978	7.2	4.8	6.2	23.0	18.3	22.2	29.7	29.1	31.0	38.3	46.4	39.0	1.7	1.4	1.6		
Limited-Scope:																					
Alexandria MSA	534	7,334	1.5	2,844	7.3	4.9	5.9	21.4	15.5	22.2	27.3	23.4	24.6	43.7	55.8	47.2	0.3	0.4	0.1		
Baton Rouge MSA	6,802	104,469	19.7	20,466	8.7	5.1	7.2	18.4	13.1	17.0	34.0	33.8	33.4	37.1	46.7	40.6	1.8	1.4	1.8		
Houma MSA	1,241	18,200	3.6	5,284	3.2	2.0	3.8	15.2	13.1	15.1	43.9	41.7	45.1	35.4	41.7	33.9	2.3	1.5	2.1		
Lafayette CSA	4,802	61,334	13.9	17,501	6.3	3.6	5.3	21.1	16.0	19.5	30.0	29.6	30.7	41.6	50.3	43.6	1.0	0.5	0.8		
Lake Charles CSA	1,439	21,290	4.2	4,934	8.0	4.4	8.5	16.2	18.1	17.6	40.2	36.8	37.6	35.4	40.7	36.2	0.2	0.0	0.1		
Monroe CSA	1,088	16,438	3.1	5,595	10.3	5.4	8.2	17.4	13.9	17.2	26.3	27.4	27.3	43.6	51.1	44.6	2.4	2.2	2.7		
Shreveport CSA	1,963	28,123	5.7	8,994	6.0	3.9	6.7	24.3	18.6	22.9	25.5	26.6	26.5	37.0	46.5	37.5	7.3	4.4	6.5		
Non-MSA LA	259	2,603	0.7	1,172	0.0	0.0	0.0	0.3	0.4	0.4	33.9	34.0	32.9	65.8	65.6	66.7	0.0	0.0	0.0		
Total	34,573	505,809	100.0	110,768	7.2	4.5	6.3	20.7	16.5	19.9	31.1	30.6	31.7	38.9	47.0	40.3	2.1	1.4	1.8		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2020-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
New Orleans CSA	11,921	328,458	48.3	49,119	91.3	59.1	37.6	2.6	13.9	6.1	26.9
Limited-Scope:											
Alexandria MSA	401	6,732	1.6	2,901	85.4	61.3	39.9	3.8	15.2	10.8	23.4
Baton Rouge MSA	4,812	158,310	19.5	22,210	90.1	56.8	35.0	2.7	16.5	7.1	26.7
Houma MSA	818	16,824	3.3	5,675	87.3	59.0	27.5	4.0	17.0	8.7	24.0
Lafayette CSA	3,419	85,069	13.9	18,062	89.2	60.5	33.3	3.4	14.1	7.4	25.4
Lake Charles CSA	1,172	36,077	4.8	5,454	88.1	56.5	32.1	3.0	19.5	8.9	24.1
Monroe CSA	691	16,046	2.8	6,141	88.8	58.3	26.8	3.4	20.1	7.8	21.6
Shreveport CSA	1,274	37,544	5.2	9,452	88.9	57.5	33.7	2.9	17.4	8.2	25.0
Non-MSA LA	155	2,509	0.6	1,029	88.2	60.0	30.8	2.0	12.9	9.8	27.1
Total	24,663	687,569	100.0	120,043	89.9	58.7	34.9	2.9	15.2	7.2	26.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
New Orleans CSA	16,445	246,018	47.6	43,978	93.2	73.4	51.4	1.9	15.1	4.9	11.5
Limited-Scope:											
Alexandria MSA	534	7,334	1.5	2,844	88.4	65.0	48.5	2.8	19.9	8.8	15.2
Baton Rouge MSA	6,802	104,469	19.7	20,466	92.2	70.7	50.8	2.1	17.4	5.8	11.8
Houma MSA	1,241	18,200	3.6	5,284	89.6	65.5	50.1	3.1	18.5	7.3	16.0
Lafayette CSA	4,802	61,334	13.9	17,501	91.6	72.7	49.1	2.5	14.7	5.9	12.6
Lake Charles CSA	1,439	21,290	4.2	4,934	90.4	66.9	51.7	2.3	18.1	7.3	14.9
Monroe CSA	1,088	16,438	3.1	5,595	90.7	72.3	42.6	2.9	18.2	6.4	9.5
Shreveport CSA	1,963	28,123	5.7	8,994	91.3	69.2	47.6	2.2	19.3	6.5	11.5
Non-MSA LA	259	2,603	0.7	1,172	89.6	71.0	54.9	1.7	13.9	8.7	15.1
Total	34,573	505,809	100.0	110,768	92.0	71.8	50.1	2.2	16.2	5.8	12.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
New Orleans CSA	89	744	28.0	193	5.5	3.4	2.1	19.1	13.5	20.7	41.9	48.3	45.1	32.9	32.6	31.1	0.6	2.2	1.0
Limited-Scope:																			
Alexandria MSA	18	286	5.7	75	1.9	0.0	0.0	4.1	0.0	1.3	44.1	77.8	52.0	49.9	22.2	46.7	0.0	0.0	0.0
Baton Rouge MSA	38	412	12.0	78	3.8	5.3	2.6	16.5	10.5	16.7	35.2	36.8	41.0	44.5	47.4	39.7	0.0	0.0	0.0
Houma MSA	25	220	7.9	56	0.0	0.0	0.0	11.8	12.0	7.1	64.7	60.0	80.4	23.5	28.0	12.5	0.0	0.0	0.0
Lafayette CSA	54	545	17.0	308	2.9	3.7	1.3	17.1	13.0	15.6	53.6	55.6	67.9	26.4	27.8	15.3	0.0	0.0	0.0
Lake Charles CSA	17	246	5.3	81	3.2	0.0	1.2	16.8	17.6	12.3	40.6	52.9	69.1	39.5	29.4	17.3	0.0	0.0	0.0
Monroe CSA	26	270	8.2	101	5.0	3.8	4.0	6.5	3.8	1.0	22.5	15.4	15.8	65.8	76.9	79.2	0.1	0.0	0.0
Shreveport CSA	33	491	10.4	118	8.1	3.0	5.9	14.4	0.0	8.5	35.0	42.4	44.9	42.6	54.5	39.8	0.0	0.0	0.8
Non-MSA LA	18	305	5.7	42	0.0	0.0	0.0	0.0	0.0	0.0	41.3	61.1	42.9	58.7	38.9	57.1	0.0	0.0	0.0
Total	318	3,519	100.0	1,052	4.2	2.8	2.1	15.4	9.4	12.1	42.5	48.4	52.8	37.7	38.7	32.8	0.2	0.6	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
New Orleans CSA	155	1,380	27.4	138	5.2	0.6	1.4	20.7	11.0	12.3	38.2	51.0	47.8	34.8	36.1	37.7	1.1	1.3	0.7	
Limited-Scope:																				
Alexandria MSA	27	329	4.8	75	1.2	0.0	1.3	21.8	59.3	32.0	28.0	11.1	16.0	48.9	29.6	50.7	0.0	0.0	0.0	
Baton Rouge MSA	74	735	13.1	73	5.4	4.1	2.7	17.7	14.9	27.4	37.3	33.8	31.5	37.8	47.3	37.0	1.7	0.0	1.4	
Houma MSA	31	308	5.5	44	1.4	0.0	0.0	14.2	12.9	13.6	49.7	61.3	65.9	33.2	25.8	20.5	1.5	0.0	0.0	
Lafayette CSA	121	1,334	21.4	316	3.7	4.1	3.2	21.5	19.8	15.5	38.7	37.2	57.6	36.0	38.8	23.7	0.1	0.0	0.0	
Lake Charles CSA	25	401	4.4	66	6.8	4.0	1.5	15.8	24.0	13.6	36.2	36.0	45.5	41.2	36.0	39.4	0.0	0.0	0.0	
Monroe CSA	53	576	9.4	106	6.2	0.0	1.9	9.4	7.5	2.8	29.8	15.1	23.6	53.6	75.5	70.8	1.1	1.9	0.9	
Shreveport CSA	52	714	9.2	87	4.3	0.0	1.1	19.4	15.4	17.2	33.2	42.3	51.7	39.4	42.3	27.6	3.7	0.0	2.3	
Non-MSA LA	28	312	4.9	60	0.0	0.0	0.0	0.0	0.0	0.0	24.6	17.9	21.7	75.4	82.1	78.3	0.0	0.0	0.0	
Total	566	6,089	100.0	965	4.5	1.8	2.0	18.4	15.9	14.8	36.9	38.0	44.0	39.0	43.8	38.7	1.2	0.5	0.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
New Orleans CSA	89	744	28.0	193	97.2	86.5	69.4	1.4	1.1	1.4	12.4
Limited-Scope:											
Alexandria MSA	18	286	5.7	75	96.1	55.6	46.7	2.4	11.1	1.5	33.3
Baton Rouge MSA	38	412	11.9	78	98.3	92.1	50.0	1.1	5.3	0.7	2.6
Houma MSA	25	220	7.9	56	97.2	72.0	44.6	1.8	4.0	1.0	24.0
Lafayette CSA	54	545	17.0	308	97.9	59.3	38.6	1.4	18.5	0.7	22.2
Lake Charles CSA	17	246	5.3	81	98.8	58.8	39.5	0.3	0.0	0.8	41.2
Monroe CSA	26	270	8.2	101	97.8	61.5	41.6	1.1	23.1	1.1	15.4
Shreveport CSA	33	491	10.4	118	97.9	72.7	34.7	1.0	12.1	1.1	15.2
Non-MSA LA	18	305	5.7	42	97.1	61.1	31.0	0.8	5.6	2.1	33.3
Total	318	3,519	100.0	1,052	97.7	73.3	45.6	1.3	8.5	1.0	18.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
New Orleans CSA	155	1,380	27.4	138	98.0	81.3	64.5	0.9	1.9	1.1	16.8
Limited-Scope:											
Alexandria MSA	27	329	4.8	75	97.5	77.8	52.0	1.1	7.4	1.4	14.8
Baton Rouge MSA	74	735	13.1	73	98.6	86.5	57.5	0.7	6.8	0.7	6.8
Houma MSA	31	308	5.5	44	98.0	80.6	47.7	1.3	6.5	0.7	12.9
Lafayette CSA	121	1,334	21.4	316	98.5	77.7	43.7	0.9	6.6	0.5	15.7
Lake Charles CSA	25	401	4.4	66	98.9	80.0	48.5	0.2	0.0	0.8	20.0
Monroe CSA	53	576	9.4	106	98.2	73.6	42.5	0.9	9.4	1.0	17.0
Shreveport CSA	52	714	9.2	87	98.4	73.1	50.6	0.8	11.5	0.8	15.4
Non-MSA LA	28	312	4.9	60	98.3	78.6	43.3	0.6	14.3	1.1	7.1
Total	566	6,089	100.0	965	98.3	79.3	49.3	0.8	6.2	0.9	14.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	968	347,321	100.0	35,221	1.0	0.8	1.8	16.1	15.4	17.9	58.7	53.5	56.7	24.1	30.3	23.6	0.0	0.0	0.0
Total	968	347,321	100.0	35,221	1.0	0.8	1.8	16.1	15.4	17.9	58.7	53.5	56.7	24.1	30.3	23.6	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Portland CSA	291	129,739	100.0	19,277	0.1	0.7	0.3	17.9	22.3	18.4	52.9	45.7	53.4	29.2	31.3	27.9	0.0	0.0	0.0		
Total	291	129,739	100.0	19,277	0.1	0.7	0.3	17.9	22.3	18.4	52.9	45.7	53.4	29.2	31.3	27.9	0.0	0.0	0.0		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Portland CSA	968	347,321	100.0	35,221	20.3	4.5	6.7	17.8	14.6	19.4	21.8	22.0	22.2	40.2	52.4	36.9	0.0	6.5	14.7	
Total	968	347,321	100.0	35,221	20.3	4.5	6.7	17.8	14.6	19.4	21.8	22.0	22.2	40.2	52.4	36.9	0.0	6.5	14.7	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	291	129,739,180	100.0	19,277	18.1	6.9	7.0	18.1	24.7	19.3	23.7	17.2	22.8	40.1	44.7	40.5	0.0	6.5	10.4
Total	291	129,739,180	100.0	19,277	18.1	6.9	7.0	18.1	24.7	19.3	23.7	17.2	22.8	40.1	44.7	40.5	0.0	6.5	10.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Portland CSA	1,710	19,790	100.0	15,625	2.7	3.3	2.7	26.0	19.2	23.8	48.9	49.9	49.6	22.4	27.6	24.0	0.0	0.0	0.0		
Total	1,710	19,790	100.0	15,625	2.7	3.3	2.7	26.0	19.2	23.8	48.9	49.9	49.6	22.4	27.6	24.0	0.0	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Portland CSA	3,523	40,495	100.0	14,271	0.2	0.1	0.2	20.9	17.5	19.7	52.4	48.0	50.3	26.5	34.4	29.8	0.0	0.0	0.0		
Total	3,523	40,495	100.0	14,271	0.2	0.1	0.2	20.9	17.5	19.7	52.4	48.0	50.3	26.5	34.4	29.8	0.0	0.0	0.0		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Portland CSA	1,710	19,790	100.0	15,625	84.6	66.3	44.2	5.4	17.0	10.0	16.7
Total	1,710	19,790	100.0	15,625	84.6	66.3	44.2	5.4	17.0	10.0	16.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Portland CSA	3,523	40,495	100.0	14,271	89.4	71.1	49.5	3.4	16.2	7.2	12.7
Total	3,523	40,495	100.0	14,271	89.4	71.1	49.5	3.4	16.2	7.2	12.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	36	306	100.0	187	1.1	0.0	2.1	15.0	13.9	12.3	60.1	63.9	59.4	23.8	22.2	26.2	0.0	0.0	0.0
Total	36	306	100.0	187	1.1	0.0	2.1	15.0	13.9	12.3	60.1	63.9	59.4	23.8	22.2	26.2	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Portland CSA	81	971	100.0	123	0.1	0.0	0.0	18.5	19.8	22.0	54.1	49.4	55.3	27.3	30.9	22.8	0.0	0.0	0.0
Total	81	971	100.0	123	0.1	0.0	0.0	18.5	19.8	22.0	54.1	49.4	55.3	27.3	30.9	22.8	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Portland CSA	36	306	100.0	187	95.5	91.7	61.0	2.8	2.8	1.8	5.6
Total	36	306	100.0	187	95.5	91.7	61.0	2.8	2.8	1.8	5.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Portland CSA	81	971	100.0	123	96.7	70.4	61.0	2.0	12.3	1.3	17.3
Total	81	971	100.0	123	96.7	70.4	61.0	2.0	12.3	1.3	17.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Springfield MSA	516	125,504	66.7	24,532	4.7	3.1	6.2	12.4	8.1	13.8	35.2	29.3	34.5	47.6	59.5	45.5	0.0	0.0	0.0		
Limited-Scope:																					
Pittsfield MSA	156	62,365	20.2	4,922	3.1	1.3	3.8	10.2	4.5	7.9	55.5	41.7	52.5	31.2	52.6	35.8	0.0	0.0	0.0		
Non-MSA MA	102	151,132	13.2	1,909	0.0	0.0	0.0	18.1	9.8	20.0	81.9	90.2	80.0	0.0	0.0	0.0	0.0	0.0	0.0		
Total	774	339,001	100.0	31,363	4.3	2.3	5.5	12.1	7.6	13.2	40.4	39.8	40.1	43.2	50.3	41.2	0.0	0.0	0.0		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Springfield MSA	270	66,650	72.2	16,176	2.3	7.0	4.0	16.0	27.8	20.7	37.0	32.6	36.3	44.7	32.2	38.9	0.0	0.4	0.1
Limited-Scope:																			
Pittsfield MSA	54	16,942	14.4	3,820	0.3	3.7	1.0	15.4	13.0	17.5	56.5	55.6	55.4	27.8	27.8	26.1	0.0	0.0	0.0
Non-MSA MA	50	139,855	13.4	976	0.0	0.0	0.0	23.9	10.0	19.1	76.1	90.0	80.9	0.0	0.0	0.0	0.0	0.0	0.0
Total	374	223,447	100.0	20,972	1.8	5.6	3.3	16.1	23.3	20.1	41.8	43.6	41.8	40.2	27.3	34.7	0.0	0.3	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Springfield MSA	516	125,504	66.7	24,532	24.7	4.3	6.2	15.7	21.9	22.4	17.9	22.7	23.2	41.8	47.3	31.6	0.0	3.9	16.7
Limited-Scope:																			
Pittsfield MSA	156	62,365	20.2	4,922	21.3	3.8	9.0	17.6	8.3	18.6	20.5	12.8	19.6	40.6	66.0	39.4	0.0	9.0	13.5
Non-MSA MA	102	151,132	13.2	1,909	23.7	0.0	3.7	12.4	4.9	10.0	17.1	10.8	15.2	46.9	58.8	59.5	0.0	25.5	11.6
Total	774	339,001	100.0	31,363	24.0	3.6	6.5	16.0	16.9	21.1	18.3	19.1	22.2	41.7	52.6	34.5	0.0	7.8	15.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Springfield MSA	270	66,650	72.2	16,176	24.1	6.3	7.7	16.2	38.9	26.9	18.2	22.2	24.4	41.5	29.6	28.0	0.0	3.0	13.0
Limited-Scope:																			
Pittsfield MSA	54	16,942	14.4	3,820	19.7	1.9	7.9	17.8	7.4	21.1	22.1	27.8	22.9	40.4	48.1	38.8	0.0	14.8	9.3
Non-MSA MA	50	139,855	13.4	976	25.1	2.0	3.2	18.2	2.0	8.4	23.3	4.0	13.4	33.4	56.0	64.2	0.0	36.0	10.8
Total	374	223,447	100.0	20,972	23.3	5.1	7.5	16.5	29.4	25.0	19.0	20.6	23.6	41.2	35.8	31.7	0.0	9.1	12.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Springfield MSA	1,536	16,094	75.0	14,704	14.3	6.5	12.8	15.2	10.5	14.9	28.8	31.7	30.2	41.1	51.2	41.9	0.8	0.1	0.2		
Limited-Scope:																					
Pittsfield MSA	418	4,764	20.4	2,700	14.2	7.4	11.2	6.5	6.2	7.2	41.8	43.1	40.7	37.4	43.3	40.9	0.0	0.0	0.0		
Non-MSA MA	95	1,046	4.6	1,163	0.0	0.0	0.0	28.4	29.5	27.4	71.6	70.5	72.6	0.0	0.0	0.0	0.0	0.0	0.0		
Total	2,049	21,904	100.0	18,567	13.7	6.4	11.7	14.0	10.5	14.6	33.0	35.8	34.4	38.8	47.2	39.1	0.6	0.0	0.2		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Springfield MSA	2,941	33,580	74.4	12,915	10.0	4.6	8.5	21.6	14.1	21.2	28.5	30.1	30.1	38.8	50.8	39.7	1.1	0.4	0.5		
Limited-Scope:																					
Pittsfield MSA	825	9,480	20.9	2,982	22.6	12.5	10.0	12.1	11.0	12.8	43.3	50.4	52.8	22.1	26.1	24.4	0.0	0.0	0.0		
Non-MSA MA	188	2,889	4.8	1,214	0.0	0.0	0.0	29.1	34.0	28.8	70.9	66.0	71.2	0.0	0.0	0.0	0.0	0.0	0.0		
Total	3,954	45,949	100.0	17,111	12.2	6.0	8.1	19.9	14.4	20.3	34.1	36.0	37.0	33.0	43.2	34.2	0.8	0.3	0.4		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Springfield MSA	1,536	16,094	75.0	14,704	85.0	68.0	45.1	4.7	18.6	10.2	13.3
Limited-Scope:											
Pittsfield MSA	418	4,764	20.4	2,700	84.5	63.4	44.3	4.7	19.4	10.8	17.2
Non-MSA MA	95	1,046	4.6	1,163	85.4	67.4	37.3	5.4	17.9	9.2	14.7
Total	2,049	21,904	100.0	18,567	84.9	67.1	44.5	4.7	18.7	10.3	14.2
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Springfield MSA	2,941	33,580	74.4	12,915	87.1	68.7	52.5	3.9	19.3	9.0	12.0
Limited-Scope:											
Pittsfield MSA	825	9,480	20.9	2,982	88.6	69.8	48.8	3.4	15.4	8.0	14.8
Non-MSA MA	188	2,889	4.8	1,214	91.4	73.9	40.9	3.0	19.1	5.6	6.9
Total	3,954	45,949	100.0	17,111	87.7	69.1	51.0	3.7	18.5	8.6	12.4
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Springfield MSA	28	299	63.6	83	3.1	0.0	1.2	5.9	0.0	4.8	31.7	14.3	27.7	59.2	85.7	66.3	0.0	0.0	0.0
Limited-Scope:																			
Pittsfield MSA	9	60	20.5	27	2.1	0.0	0.0	4.2	22.2	7.4	48.4	33.3	40.7	45.4	44.4	51.9	0.0	0.0	0.0
Non-MSA MA	7	76	15.9	11	0.0	0.0	0.0	21.6	14.3	18.2	78.4	85.7	81.8	0.0	0.0	0.0	0.0	0.0	0.0
Total	44	435	100.0	121	2.7	0.0	0.8	6.4	6.8	6.6	38.1	29.5	35.5	52.8	63.6	57.0	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Springfield MSA	47	512	50.0	83	2.0	0.0	1.2	9.7	4.3	4.8	34.7	38.3	33.7	53.4	57.4	60.2	0.2	0.0	0.0
Limited-Scope:																			
Pittsfield MSA	35	380	37.2	35	6.5	2.9	0.0	5.2	8.6	0.0	58.3	57.1	60.0	30.0	31.4	40.0	0.0	0.0	0.0
Non-MSA MA	12	105	12.8	12	0.0	0.0	0.0	22.4	25.0	8.3	77.6	75.0	91.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	94	997	100.0	130	2.8	1.1	0.8	9.7	8.5	3.8	43.9	50.0	46.2	43.3	40.4	49.2	0.2	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Springfield MSA	28	299	63.6	83	96.7	89.3	55.4	1.7	3.6	1.6	7.1
Limited-Scope:											
Pittsfield MSA	9	60	20.5	27	96.1	66.7	59.3	2.5	11.1	1.4	22.2
Non-MSA MA	7	76	15.9	11	95.5	71.4	45.5	2.7	0.0	1.8	28.6
Total	44	435	100.0	121	96.5	81.8	55.4	2.0	4.5	1.6	13.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Springfield MSA	47	512	50.0	83	96.9	91.5	63.9	1.6	4.3	1.5	4.3
Limited-Scope:											
Pittsfield MSA	35	380	37.2	35	96.9	82.9	71.4	1.8	5.7	1.3	11.4
Non-MSA MA	12	105	12.8	12	97.6	33.3	41.7	1.5	0.0	1.0	66.7
Total	94	997	100.0	130	96.9	80.9	63.8	1.6	4.3	1.4	14.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Detroit CSA	19,938	4,733,804	78.1	268,481	6.3	1.6	2.6	19.4	11.2	14.0	37.6	33.7	38.7	36.6	53.4	44.6	0.1	0.0	0.1
Limited-Scope:																			
Grand Rapids CSA	3,151	668,712	12.3	70,631	2.4	1.5	2.1	17.0	13.4	15.8	50.0	45.6	49.3	30.7	39.5	32.8	0.0	0.0	0.0
Kalamazoo CSA	347	77,248	1.4	13,719	4.9	2.9	3.1	11.1	10.1	11.1	50.7	39.5	48.6	33.3	47.6	37.1	0.1	0.0	0.1
Lansing MSA	802	139,841	3.1	24,799	2.5	1.1	2.3	16.5	10.2	15.1	50.8	41.1	48.6	30.1	47.4	34.0	0.1	0.1	0.1
Niles MSA	424	148,046	1.7	8,296	5.7	1.4	1.7	13.7	9.0	12.6	49.5	59.2	52.3	31.1	30.4	33.5	0.0	0.0	0.0
Saginaw CSA	158	21,031	0.6	6,467	7.8	1.3	1.4	9.6	2.5	3.8	54.8	55.7	58.5	27.8	40.5	36.3	0.0	0.0	0.0
Non-MSA MI	716	199,288	2.8	11,810	0.0	0.0	0.0	7.2	3.8	6.4	59.7	46.8	54.5	33.1	49.4	39.1	0.0	0.0	0.0
Total	25,536	5,987,970	100.0	404,203	5.2	1.5	2.4	17.7	11.1	13.9	42.3	36.4	42.6	34.7	50.9	41.1	0.1	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Detroit CSA	5,707	1,383,919	74.7	147,614	4.7	3.9	3.3	20.9	19.7	18.2	35.7	33.7	37.7	38.1	42.2	40.4	0.6	0.6	0.4	
Limited-Scope:																				
Grand Rapids CSA	948	221,165	12.4	41,581	2.4	4.0	2.7	16.3	20.4	17.1	48.6	42.2	48.0	31.8	32.6	31.4	0.9	0.8	0.7	
Kalamazoo CSA	165	37,705	2.2	8,598	2.8	8.5	3.8	18.4	20.0	20.7	42.6	41.2	38.9	36.0	30.3	36.5	0.1	0.0	0.2	
Lansing MSA	303	52,651	4.0	15,302	2.2	3.6	2.5	15.2	20.1	16.9	52.3	46.5	52.4	30.2	29.7	28.0	0.1	0.0	0.2	
Niles MSA	187	67,803	2.4	5,342	5.6	3.7	2.5	13.6	11.8	15.3	44.0	41.7	44.0	36.3	42.2	37.9	0.6	0.5	0.3	
Saginaw CSA	72	11,204	0.9	4,306	2.8	1.4	1.1	21.3	18.1	18.7	34.3	37.5	34.3	41.7	43.1	45.9	0.0	0.0	0.0	
Non-MSA MI	260	85,953	3.4	7,131	0.0	0.0	0.0	11.5	8.5	11.8	53.8	57.7	49.4	34.7	33.8	38.7	0.0	0.0	0.0	
Total	7,642	1,860,400	100.0	229,874	3.9	3.8	3.0	19.2	19.2	17.8	39.8	36.5	41.0	36.5	40.0	37.8	0.6	0.5	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Detroit CSA	19,938	4,733,804	78.1	268,481	23.0	9.1	9.7	16.6	20.7	19.9	19.1	22.9	23.1	41.3	43.6	34.6	0.0	3.7	12.7	
Limited-Scope:																				
Grand Rapids CSA	3,151	668,712	12.3	70,631	20.0	9.1	8.6	17.9	24.9	22.0	22.0	23.6	23.3	40.1	39.2	34.2	0.0	3.1	11.9	
Kalamazoo CSA	347	77,248	1.4	13,719	20.5	7.5	10.2	16.6	20.5	21.4	20.0	21.0	23.4	42.9	47.3	34.3	0.0	3.7	10.8	
Lansing MSA	802	139,841	3.1	24,799	21.0	9.0	9.7	17.3	21.4	22.9	20.7	23.6	23.9	41.0	42.0	31.3	0.0	4.0	12.3	
Niles MSA	424	148,046	1.7	8,296	22.6	3.3	7.9	17.0	9.4	17.6	19.4	12.3	18.6	40.9	67.0	45.6	0.0	8.0	10.2	
Saginaw CSA	158	21,031	0.6	6,467	21.2	7.6	8.1	17.1	17.1	21.4	20.7	27.8	23.5	41.0	40.5	35.7	0.0	7.0	11.3	
Non-MSA MI	716	199,288	2.8	11,810	16.4	4.2	4.7	17.5	10.8	14.1	21.9	20.8	19.6	44.2	58.4	51.4	0.0	5.9	10.2	
Total	25,536	5,987,970	100.0	404,203	22.0	8.8	9.3	16.9	20.8	20.3	19.8	22.8	23.0	41.2	43.8	35.1	0.0	3.8	12.3	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Detroit CSA	5,707	1,383,919	74.7	147,614	21.7	15.8	11.9	17.2	24.0	22.8	20.1	22.9	23.0	40.9	33.4	30.8	0.0	3.9	11.5
Limited-Scope:																			
Grand Rapids CSA	948	221,165	12.4	41,581	18.8	13.3	10.9	18.5	28.7	23.8	22.9	23.5	22.9	39.7	30.4	31.3	0.0	4.1	11.2
Kalamazoo CSA	165	37,705	2.2	8,598	21.5	13.9	12.1	18.3	26.7	21.9	19.7	21.2	21.9	40.5	34.5	31.4	0.0	3.6	12.7
Lansing MSA	303	52,651	4.0	15,302	20.3	16.5	12.9	17.8	25.4	25.5	22.0	26.4	23.2	39.9	28.1	26.8	0.0	3.6	11.7
Niles MSA	187	67,803	2.4	5,342	22.8	11.2	9.2	17.7	13.4	17.8	17.8	9.6	21.5	41.7	58.3	41.4	0.0	7.5	10.1
Saginaw CSA	72	11,204	0.9	4,306	20.7	11.1	10.1	17.7	26.4	22.4	21.2	19.4	23.3	40.4	38.9	31.7	0.0	4.2	12.4
Non-MSA MI	260	85,953	3.4	7,131	17.5	9.6	6.2	17.0	18.1	16.6	21.6	18.5	20.0	43.9	46.5	47.7	0.0	7.3	9.5
Total	7,642	1,860,400	100.0	229,874	21.0	15.1	11.5	17.5	24.3	22.8	20.7	22.5	22.8	40.7	33.9	31.4	0.0	4.1	11.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Detroit CSA	39,315	1,416,106	77.8	127,608	8.2	5.6	7.8	19.8	15.9	19.8	32.2	32.2	32.3	38.8	45.7	39.3	1.0	0.7	0.8		
Limited-Scope:																					
Grand Rapids CSA	6,104	144,593	12.1	23,135	3.9	2.5	4.0	17.3	12.3	16.3	45.3	46.9	46.4	33.6	38.3	33.3	0.0	0.0	0.0		
Kalamazoo CSA	707	12,866	1.4	4,057	8.3	5.0	8.0	19.8	15.8	18.0	45.1	40.2	45.8	26.2	39.0	28.0	0.6	0.0	0.2		
Lansing MSA	1,350	37,609	2.7	7,424	6.6	5.6	6.4	19.8	15.6	18.8	39.5	37.0	38.9	31.7	39.9	34.6	2.4	2.0	1.3		
Niles MSA	707	18,931	1.4	2,573	10.1	7.2	9.8	11.3	7.8	12.1	43.8	39.7	45.6	34.7	45.3	32.5	0.0	0.0	0.0		
Saginaw CSA	597	22,844	1.2	2,680	6.7	4.7	6.8	11.7	7.9	9.8	52.5	57.6	53.7	29.1	29.8	29.7	0.0	0.0	0.0		
Non-MSA MI	1,746	49,752	3.5	5,225	0.0	0.0	0.0	8.0	7.0	9.5	54.4	50.8	52.4	37.6	42.2	38.1	0.0	0.0	0.0		
Total	50,526	1,702,701	100.0	172,702	7.2	5.0	7.0	18.7	14.9	18.7	36.2	35.3	35.9	37.0	44.2	37.7	0.8	0.6	0.7		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Detroit CSA	49,175	776,170	74.4	118,930	6.7	3.8	5.9	20.4	15.6	19.8	31.2	31.6	32.2	39.1	47.5	40.1	2.6	1.5	2.1
Limited-Scope:																			
Grand Rapids CSA	9,095	121,044	13.8	21,530	3.4	2.0	2.8	19.1	13.4	18.7	44.5	43.4	44.0	32.4	40.6	33.8	0.7	0.6	0.7
Kalamazoo CSA	1,378	21,612	2.1	3,963	6.7	4.6	7.8	18.1	16.5	16.9	39.6	37.5	38.9	35.1	41.2	36.3	0.5	0.1	0.2
Lansing MSA	2,303	29,742	3.5	7,285	4.4	3.0	4.3	20.4	13.2	17.2	44.9	40.2	44.2	27.2	41.1	32.7	3.1	2.5	1.6
Niles MSA	1,083	15,732	1.6	2,428	10.0	5.5	7.4	12.8	5.6	12.7	39.1	39.1	41.4	37.6	49.7	38.5	0.5	0.1	0.1
Saginaw CSA	725	12,794	1.1	2,310	3.8	2.1	3.7	27.3	25.9	23.0	29.9	23.7	31.7	39.0	48.3	41.6	0.0	0.0	0.0
Non-MSA MI	2,325	37,977	3.5	5,174	0.0	0.0	0.0	10.5	8.2	10.3	52.0	48.3	52.1	37.5	43.4	37.7	0.0	0.0	0.0
Total	66,084	1,015,071	100.0	161,620	5.9	3.4	5.2	19.8	15.0	19.1	34.9	34.3	35.2	37.3	46.1	38.7	2.1	1.3	1.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Detroit CSA	39,315	1,416,106	77.8	127,608	87.0	55.3	45.9	4.9	15.2	8.2	29.5
Limited-Scope:											
Grand Rapids CSA	6,104	144,593	12.1	23,135	83.7	58.5	44.6	6.2	18.0	10.1	23.5
Kalamazoo CSA	707	12,866	1.4	4,057	82.6	66.5	47.8	6.0	16.3	11.4	17.3
Lansing MSA	1,350	37,609	2.7	7,424	83.1	65.0	47.9	4.9	14.4	12.0	20.6
Niles MSA	707	18,931	1.4	2,573	83.4	57.0	49.7	5.3	20.5	11.4	22.5
Saginaw CSA	597	22,844	1.2	2,680	78.9	52.3	42.3	6.3	22.4	14.8	25.3
Non-MSA MI	1,746	49,752	3.5	5,225	84.5	59.9	49.0	4.9	17.2	10.5	22.9
Total	50,526	1,702,701	100.0	172,702	85.9	56.3	45.9	5.1	15.7	9.0	28.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Detroit CSA	49,175	776,170	74.4	118,930	87.7	73.7	50.5	4.3	14.4	7.9	11.9
Limited-Scope:											
Grand Rapids CSA	9,095	121,044	13.8	21,530	84.2	69.5	48.3	5.7	17.0	10.0	13.5
Kalamazoo CSA	1,378	21,612	2.1	3,963	83.4	68.9	50.0	5.4	17.2	11.2	13.9
Lansing MSA	2,303	29,742	3.5	7,285	84.1	74.2	49.7	4.4	12.8	11.5	13.0
Niles MSA	1,083	15,732	1.6	2,428	84.2	64.5	52.2	4.7	21.1	11.1	14.3
Saginaw CSA	725	12,794	1.1	2,310	80.1	65.0	48.7	5.8	21.7	14.1	13.4
Non-MSA MI	2,325	37,977	3.5	5,174	85.1	69.2	54.4	4.4	16.1	10.5	14.7
Total	66,084	1,015,071	100.0	161,620	86.6	72.6	50.3	4.6	15.0	8.8	12.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Detroit CSA	210	3,314	42.9	619	4.8	1.4	1.6	17.0	11.9	17.6	43.8	47.1	50.6	34.1	39.5	30.2	0.3	0.0	0.0
Limited-Scope:																			
Grand Rapids CSA	107	1,511	21.9	399	1.5	4.7	2.3	13.9	15.0	16.0	52.7	49.5	52.6	31.9	30.8	29.1	0.0	0.0	0.0
Kalamazoo CSA	15	157	3.1	62	3.8	0.0	0.0	13.5	13.3	11.3	53.3	60.0	61.3	29.1	26.7	27.4	0.3	0.0	0.0
Lansing MSA	46	536	9.4	245	2.0	2.2	0.8	7.8	10.9	3.3	62.0	54.3	66.1	27.6	32.6	29.8	0.7	0.0	0.0
Niles MSA	27	269	5.5	66	1.8	0.0	0.0	5.8	3.7	4.5	67.6	70.4	71.2	24.7	25.9	24.2	0.0	0.0	0.0
Saginaw CSA	13	270	2.7	122	1.1	0.0	0.0	3.0	0.0	0.0	58.9	38.5	59.0	37.0	61.5	41.0	0.0	0.0	0.0
Non-MSA MI	71	1,525	14.5	173	0.0	0.0	0.0	2.5	0.0	0.6	67.3	67.6	82.1	30.2	32.4	17.3	0.0	0.0	0.0
Total	489	7,582	100.0	1,686	3.4	1.8	1.2	13.6	10.0	11.4	50.3	52.8	58.4	32.4	35.4	29.0	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Detroit CSA	373	4,560	45.5	483	4.3	4.0	2.7	18.4	14.7	17.2	42.4	41.0	52.8	33.9	40.2	27.1	0.9	0.0	0.2		
Limited-Scope:																					
Grand Rapids CSA	195	2,228	23.8	375	1.4	1.0	0.0	16.0	9.7	17.9	49.0	49.7	54.4	33.0	38.5	27.2	0.5	1.0	0.5		
Kalamazoo CSA	27	317	3.3	54	3.2	0.0	0.0	16.7	11.1	3.7	42.3	63.0	61.1	37.7	25.9	35.2	0.1	0.0	0.0		
Lansing MSA	62	665	7.6	195	1.3	0.0	1.0	8.9	3.2	2.6	57.7	83.9	75.9	31.1	12.9	20.5	1.0	0.0	0.0		
Niles MSA	44	344	5.4	68	2.2	0.0	0.0	11.0	4.5	7.4	56.5	63.6	60.3	30.1	31.8	32.4	0.2	0.0	0.0		
Saginaw CSA	20	178	2.4	77	0.5	10.0	1.3	8.4	0.0	0.0	43.9	40.0	64.9	47.2	50.0	33.8	0.0	0.0	0.0		
Non-MSA MI	99	1,384	12.1	156	0.0	0.0	0.0	8.5	11.1	9.0	60.0	57.6	68.6	31.6	31.3	22.4	0.0	0.0	0.0		
Total	820	9,676	100.0	1,408	3.0	2.3	1.1	15.8	11.2	12.5	46.6	50.2	59.5	33.8	36.0	26.6	0.7	0.2	0.2		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Detroit CSA	210	3,314	42.9	619	96.0	68.6	55.1	2.4	10.0	1.6	21.4
Limited-Scope:											
Grand Rapids CSA	107	1,511	21.9	399	94.3	62.6	50.1	4.2	18.7	1.5	18.7
Kalamazoo CSA	15	157	3.1	62	92.4	80.0	38.7	5.0	0.0	2.6	20.0
Lansing MSA	46	536	9.4	245	96.5	63.0	37.6	2.0	10.9	1.5	26.1
Niles MSA	27	269	5.5	66	96.0	66.7	63.6	3.3	3.7	0.7	29.6
Saginaw CSA	13	270	2.7	122	97.2	76.9	58.2	1.4	7.7	1.4	15.4
Non-MSA MI	71	1,525	14.5	173	96.7	38.0	40.5	2.2	21.1	1.1	40.8
Total	489	7,582	100.0	1,686	95.7	62.8	49.8	2.7	12.9	1.6	24.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Detroit CSA	373	4,560	45.5	483	96.3	76.4	62.1	2.1	11.5	1.6	12.1
Limited-Scope:											
Grand Rapids CSA	195	2,228	23.8	375	94.8	70.3	47.7	3.7	14.4	1.4	15.4
Kalamazoo CSA	27	317	3.3	54	93.2	74.1	35.2	4.5	22.2	2.3	3.7
Lansing MSA	62	665	7.6	195	96.6	62.9	33.3	1.9	4.8	1.5	32.3
Niles MSA	44	344	5.4	68	96.2	70.5	51.5	3.0	9.1	0.8	20.5
Saginaw CSA	20	178	2.4	77	97.0	85.0	57.1	1.8	0.0	1.1	15.0
Non-MSA MI	99	1,384	12.1	156	97.1	64.6	42.3	1.8	18.2	1.1	17.2
Total	820	9,676	100.0	1,408	96.1	72.3	50.3	2.4	12.4	1.5	15.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	6,086	2,637,858	100.0	228,061	2.2	3.5	2.4	14.8	16.9	13.6	48.3	37.2	46.7	34.7	42.3	37.2	0.1	0.1	0.1
Total	6,086	2,637,858	100.0	228,061	2.2	3.5	2.4	14.8	16.9	13.6	48.3	37.2	46.7	34.7	42.3	37.2	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	1,697	890,236	100.0	112,555	2.4	5.2	3.1	16.5	22.9	17.5	48.1	37.3	46.1	33.0	34.1	33.2	0.1	0.5	0.2
Total	1,697	890,236	100.0	112,555	2.4	5.2	3.1	16.5	22.9	17.5	48.1	37.3	46.1	33.0	34.1	33.2	0.1	0.5	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	6,086	2,637,858	100.0	228,061	20.3	7.9	8.7	17.1	22.6	21.0	21.9	19.2	21.5	40.7	42.6	32.0	0.0	7.7	16.9
Total	6,086	2,637,858	100.0	228,061	20.3	7.9	8.7	17.1	22.6	21.0	21.9	19.2	21.5	40.7	42.6	32.0	0.0	7.7	16.9
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	1,697	890,236	100.0	112,555	19.5	14.7	11.1	17.8	27.6	23.6	22.5	15.0	21.5	40.1	29.8	27.9	0.0	13.0	15.9
Total	1,697	890,236	100.0	112,555	19.5	14.7	11.1	17.8	27.6	23.6	22.5	15.0	21.5	40.1	29.8	27.9	0.0	13.0	15.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Minneapolis CSA	8,469	98,163	100.0	86,340	5.0	4.1	4.9	17.0	13.2	16.5	44.3	43.2	44.0	33.4	39.4	34.3	0.3	0.2	0.2		
Total	8,469	98,163	100.0	86,340	5.0	4.1	4.9	17.0	13.2	16.5	44.3	43.2	44.0	33.4	39.4	34.3	0.3	0.2	0.2		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Minneapolis CSA	19,239	222,800	100.0	77,347	4.0	2.2	3.5	17.7	13.8	16.8	42.3	41.6	43.3	35.1	41.6	35.6	0.9	0.8	0.8		
Total	19,239	222,800	100.0	77,347	4.0	2.2	3.5	17.7	13.8	16.8	42.3	41.6	43.3	35.1	41.6	35.6	0.9	0.8	0.8		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Minneapolis CSA	8,469	98,163	100.0	86,340	88.0	68.6	50.1	4.4	17.9	7.5	13.5
Total	8,469	98,163	100.0	86,340	88.0	68.6	50.1	4.4	17.9	7.5	13.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Minneapolis CSA	19,239	222,800	100.0	77,347	89.1	72.7	49.8	3.9	15.3	7.1	12.1
Total	19,239	222,800	100.0	77,347	89.1	72.7	49.8	3.9	15.3	7.1	12.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	122	1,293	100.0	891	1.8	0.8	0.6	10.6	4.9	2.5	56.2	54.1	73.5	31.4	40.2	23.5	0.0	0.0	0.0
Total	122	1,293	100.0	891	1.8	0.8	0.6	10.6	4.9	2.5	56.2	54.1	73.5	31.4	40.2	23.5	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Minneapolis CSA	246	2,671	100.0	730	1.7	0.8	0.3	12.4	8.9	5.1	52.7	58.5	68.5	33.0	31.7	26.2	0.2	0.0	0.0
Total	246	2,671	100.0	730	1.7	0.8	0.3	12.4	8.9	5.1	52.7	58.5	68.5	33.0	31.7	26.2	0.2	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Minneapolis CSA	122	1,293	100.0	891	96.4	72.1	57.0	2.0	12.3	1.5	15.6
Total	122	1,293	100.0	891	96.4	72.1	57.0	2.0	12.3	1.5	15.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Minneapolis CSA	246	2,671	100.0	730	96.7	76.0	59.0	1.8	8.1	1.5	15.9
Total	246	2,671	100.0	730	96.7	76.0	59.0	1.8	8.1	1.5	15.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Jackson CSA	281	63,591	100.0	21,737	5.1	1.1	0.8	12.9	5.7	4.3	35.2	22.8	28.0	46.8	70.5	67.0	0.0	0.0	0.0
Total	281	63,591	100.0	21,737	5.1	1.1	0.8	12.9	5.7	4.3	35.2	22.8	28.0	46.8	70.5	67.0	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Jackson CSA	133	33,146	100.0	13,917	4.8	0.8	1.5	13.5	8.3	8.4	37.7	27.8	32.9	43.8	63.2	57.1	0.1	0.0	0.1
Total	133	33,146	100.0	13,917	4.8	0.8	1.5	13.5	8.3	8.4	37.7	27.8	32.9	43.8	63.2	57.1	0.1	0.0	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Jackson CSA	281	63,591	100.0	21,737	21.7	1.8	4.3	16.2	9.3	13.3	17.9	22.1	18.7	44.2	57.3	41.1	0.0	9.6	22.6
Total	281	63,591	100.0	21,737	21.7	1.8	4.3	16.2	9.3	13.3	17.9	22.1	18.7	44.2	57.3	41.1	0.0	9.6	22.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Jackson CSA	133	33,146	100.0	13,917	20.9	3.8	5.0	15.5	15.0	16.4	19.4	15.0	19.4	44.2	57.9	40.6	0.0	8.3	18.6
Total	133	33,146	100.0	13,917	20.9	3.8	5.0	15.5	15.0	16.4	19.4	15.0	19.4	44.2	57.9	40.6	0.0	8.3	18.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Jackson CSA	970	11,024	100.0	16,134	6.3	2.4	5.4	16.7	7.8	14.6	31.9	32.0	32.0	45.0	57.8	48.0	0.1	0.0	0.0		
Total	970	11,024	100.0	16,134	6.3	2.4	5.4	16.7	7.8	14.6	31.9	32.0	32.0	45.0	57.8	48.0	0.1	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Jackson CSA	2,167	25,403	100.0	12,707	6.8	2.6	4.6	17.4	10.8	15.7	30.0	27.6	30.3	42.7	58.0	47.0	3.1	1.0	2.6	
Total	2,167	25,403	100.0	12,707	6.8	2.6	4.6	17.4	10.8	15.7	30.0	27.6	30.3	42.7	58.0	47.0	3.1	1.0	2.6	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Jackson CSA	970	11,024	100.0	16,134	86.8	65.2	35.3	3.8	19.7	9.4	15.2
Total	970	11,024	100.0	16,134	86.8	65.2	35.3	3.8	19.7	9.4	15.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Jackson CSA	2,167	25,403	100.0	12,707	91.8	71.9	47.0	2.2	17.4	6.0	10.7
Total	2,167	25,403	100.0	12,707	91.8	71.9	47.0	2.2	17.4	6.0	10.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Jackson CSA	21	216	100.0	282	2.3	0.0	0.0	8.7	0.0	6.0	34.4	33.3	42.9	54.6	66.7	51.1	0.1	0.0	0.0
Total	21	216	100.0	282	2.3	0.0	0.0	8.7	0.0	6.0	34.4	33.3	42.9	54.6	66.7	51.1	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Jackson CSA	42	400	100.0	265	3.5	0.0	0.4	12.5	9.5	12.5	33.6	21.4	33.2	49.3	64.3	53.6	1.2	4.8	0.4		
Total	42	400	100.0	265	3.5	0.0	0.4	12.5	9.5	12.5	33.6	21.4	33.2	49.3	64.3	53.6	1.2	4.8	0.4		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Jackson CSA	21	216	100.0	282	97.7	71.4	55.0	1.0	14.3	1.3	14.3
Total	21	216	100.0	282	97.7	71.4	55.0	1.0	14.3	1.3	14.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Jackson CSA	42	400	100.0	265	98.5	83.3	58.9	0.5	11.9	1.0	4.8
Total	42	400	100.0	265	98.5	83.3	58.9	0.5	11.9	1.0	4.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	152	42,888	31.5	10,106	1.2	0.7	1.3	19.0	11.8	13.6	60.2	55.9	63.3	19.6	31.6	21.8	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA MT	330	235,992	68.5	12,694	0.1	0.0	0.1	3.9	3.0	2.5	39.9	26.4	36.0	56.1	70.6	61.4	0.0	0.0	0.0
Total	482	278,880	100.0	22,800	0.7	0.2	0.6	11.4	5.8	7.4	50.0	35.7	48.1	37.9	58.3	43.8	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	108	31,613	41.2	5,653	0.0	0.0	0.0	17.6	14.8	15.4	59.6	53.7	58.2	22.8	31.5	26.4	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA MT	154	195,199	58.8	6,400	0.0	0.0	0.0	4.3	3.9	3.1	30.1	23.4	33.8	65.5	72.7	63.1	0.0	0.0	0.0
Total	262	226,812	100.0	12,053	0.0	0.0	0.0	10.9	8.4	8.9	44.7	35.9	45.3	44.5	55.7	45.9	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	152	42,888	31.5	10,106	19.5	3.9	5.7	18.1	19.7	17.1	21.9	22.4	22.6	40.5	48.7	35.5	0.0	5.3	19.1
Limited-Scope:																			
Non-MSA MT	330	235,992	68.5	12,694	14.0	0.3	1.5	15.3	8.2	8.6	20.8	14.5	18.1	49.9	67.0	53.2	0.0	10.0	18.6
Total	482	278,880	100.0	22,800	16.7	1.5	3.4	16.6	11.8	12.4	21.4	17.0	20.1	45.3	61.2	45.3	0.0	8.5	18.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	108	31,613	41.2	5,653	20.4	8.3	5.4	17.7	19.4	16.4	21.5	27.8	24.3	40.4	39.8	37.9	0.0	4.6	16.0
Limited-Scope:																			
Non-MSA MT	154	195,199	58.8	6,400	12.2	0.6	2.4	14.2	4.5	8.7	19.8	10.4	18.0	53.7	64.9	56.1	0.0	19.5	14.8
Total	262	226,812	100.0	12,053	16.3	3.8	3.8	15.9	10.7	12.3	20.7	17.6	21.0	47.1	54.6	47.6	0.0	13.4	15.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Billings MSA	477	5,125	32.5	4,990	2.3	0.6	2.0	28.2	22.6	24.8	53.2	55.3	58.6	16.4	21.4	14.6	0.0	0.0	0.0	
Limited-Scope:																				
Non-MSA MT	990	11,944	67.5	8,212	0.6	0.0	0.4	6.4	7.3	6.6	38.3	32.0	36.1	54.8	60.7	57.0	0.0	0.0	0.0	
Total	1,467	17,069	100.0	13,202	1.2	0.2	1.0	14.8	12.3	13.4	44.0	39.6	44.6	40.0	47.9	41.0	0.0	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Billings MSA	1,069	13,182	31.8	4,549	0.0	0.0	0.0	21.6	15.9	24.4	54.1	50.0	51.5	24.3	34.1	24.1	0.0	0.0	0.0	
Limited-Scope:																				
Non-MSA MT	2,291	28,278	68.2	7,750	0.0	0.0	0.0	7.2	8.9	7.0	20.9	22.8	21.9	71.9	68.3	71.0	0.0	0.0	0.0	
Total	3,360	41,460	100.0	12,299	0.0	0.0	0.0	12.1	11.2	13.5	32.2	31.5	32.9	55.8	57.4	53.7	0.0	0.0	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Billings MSA	477	5,125	32.5	4,990	87.2	72.3	53.3	4.1	14.9	8.7	12.8
Limited-Scope:											
Non-MSA MT	990	11,944	67.5	8,212	89.6	69.5	54.4	3.0	17.4	7.4	13.1
Total	1,467	17,069	100.0	13,202	88.7	70.4	54.0	3.4	16.6	7.9	13.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Billings MSA	1,069	13,182	31.8	4,549	90.6	73.0	53.0	2.9	16.7	6.5	10.3
Limited-Scope:											
Non-MSA MT	2,291	28,278	68.2	7,750	93.2	69.8	50.0	1.7	18.9	5.1	11.4
Total	3,360	41,460	100.0	12,299	92.3	70.8	51.1	2.1	18.2	5.6	11.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	14	190	35.0	250	1.5	0.0	0.4	14.8	7.1	3.2	64.7	71.4	84.0	19.0	21.4	12.4	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA MT	26	292	65.0	196	0.3	0.0	0.0	5.3	0.0	11.2	36.4	65.4	41.3	58.1	34.6	47.4	0.0	0.0	0.0
Total	40	482	100.0	446	0.8	0.0	0.2	9.2	2.5	6.7	48.0	67.5	65.2	42.1	30.0	27.8	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Billings MSA	25	257	28.7	221	0.0	0.0	0.0	12.9	4.0	3.2	61.9	88.0	74.7	25.1	8.0	22.2	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA MT	62	699	71.3	141	0.0	0.0	0.0	6.9	4.8	7.1	17.7	29.0	18.4	75.4	66.1	74.5	0.0	0.0	0.0
Total	87	956	100.0	362	0.0	0.0	0.0	9.1	4.6	4.7	34.0	46.0	52.8	56.8	49.4	42.5	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Billings MSA	14	190	35.0	250	97.0	85.7	80.8	1.9	7.1	1.1	7.1
Limited-Scope:											
Non-MSA MT	26	292	65.0	196	97.4	65.4	69.9	1.2	23.1	1.4	11.5
Total	40	482	100.0	446	97.2	72.5	76.0	1.5	17.5	1.3	10.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Billings MSA	25	257	28.7	221	97.5	88.0	67.4	1.5	0.0	1.0	12.0
Limited-Scope:											
Non-MSA MT	62	699	71.3	141	98.0	72.6	62.4	0.8	24.2	1.1	3.2
Total	87	956	100.0	362	97.9	77.0	65.5	1.1	17.2	1.1	5.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Lincoln CSA	426	97,174	100.0	19,440	1.6	0.9	1.9	19.5	11.3	16.9	38.5	33.6	35.7	40.2	54.2	45.4	0.2	0.0	0.2
Total	426	97,174	100.0	19,440	1.6	0.9	1.9	19.5	11.3	16.9	38.5	33.6	35.7	40.2	54.2	45.4	0.2	0.0	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Lincoln CSA	176	41,991	100.0	10,527	2.3	4.5	3.4	15.6	18.2	15.5	41.2	40.3	39.2	40.7	36.9	41.6	0.1	0.0	0.2		
Total	176	41,991	100.0	10,527	2.3	4.5	3.4	15.6	18.2	15.5	41.2	40.3	39.2	40.7	36.9	41.6	0.1	0.0	0.2		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Lincoln CSA	426	97,174	100.0	19,440	21.3	8.7	7.8	17.1	30.5	20.0	21.2	24.4	22.4	40.5	36.2	30.2	0.0	0.2	19.6
Total	426	97,174	100.0	19,440	21.3	8.7	7.8	17.1	30.5	20.0	21.2	24.4	22.4	40.5	36.2	30.2	0.0	0.2	19.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Lincoln CSA	176	41,991	100.0	10,527	19.3	7.4	7.8	18.7	31.3	19.8	22.2	25.6	22.7	39.8	33.5	30.5	0.0	2.3	19.2
Total	176	41,991	100.0	10,527	19.3	7.4	7.8	18.7	31.3	19.8	22.2	25.6	22.7	39.8	33.5	30.5	0.0	2.3	19.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Lincoln CSA	1,136	11,903	100.0	6,619	3.7	2.3	2.8	26.7	21.0	23.6	29.6	28.7	29.6	38.2	47.4	43.1	1.8	0.6	1.0		
Total	1,136	11,903	100.0	6,619	3.7	2.3	2.8	26.7	21.0	23.6	29.6	28.7	29.6	38.2	47.4	43.1	1.8	0.6	1.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Lincoln CSA	2,277	26,566	100.0	5,713	5.7	3.2	3.9	16.6	13.6	19.1	31.9	31.4	32.5	43.1	50.3	42.3	2.6	1.4	2.1		
Total	2,277	26,566	100.0	5,713	5.7	3.2	3.9	16.6	13.6	19.1	31.9	31.4	32.5	43.1	50.3	42.3	2.6	1.4	2.1		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Lincoln CSA	1,136	11,903	100.0	6,619	83.4	66.5	59.5	5.3	21.7	11.3	11.9
Total	1,136	11,903	100.0	6,619	83.4	66.5	59.5	5.3	21.7	11.3	11.9
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Lincoln CSA	2,277	26,566	100.0	5,713	88.5	66.9	54.1	3.3	21.5	8.2	11.6
Total	2,277	26,566	100.0	5,713	88.5	66.9	54.1	3.3	21.5	8.2	11.6
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Lincoln CSA	19	166	100.0	398	1.4	0.0	0.0	12.3	5.3	4.3	23.3	26.3	12.1	62.9	68.4	83.7	0.1	0.0	0.0
Total	19	166	100.0	398	1.4	0.0	0.0	12.3	5.3	4.3	23.3	26.3	12.1	62.9	68.4	83.7	0.1	0.0	0.0
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Lincoln CSA	44	434	100.0	223	3.4	0.0	0.0	8.5	9.1	2.2	32.3	18.2	35.9	55.0	72.7	61.9	0.7	0.0	0.0	
Total	44	434	100.0	223	3.4	0.0	0.0	8.5	9.1	2.2	32.3	18.2	35.9	55.0	72.7	61.9	0.7	0.0	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Lincoln CSA	19	166	100.0	398	98.3	78.9	76.6	1.1	0.0	0.6	21.1
Total	19	166	100.0	398	98.3	78.9	76.6	1.1	0.0	0.6	21.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Lincoln CSA	44	434	100.0	223	98.8	68.2	66.8	0.6	11.4	0.6	20.5
Total	44	434	100.0	223	98.8	68.2	66.8	0.6	11.4	0.6	20.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Las Vegas MSA	5,619	1,818,306	79.1	155,149	1.9	0.9	1.3	16.9	11.1	12.0	41.7	36.4	42.8	39.5	51.5	43.9	0.0	0.1	0.0
Limited-Scope:																			
Reno CSA	1,481	797,304	20.9	43,957	2.1	2.0	1.9	13.0	8.7	10.4	43.2	32.9	43.8	41.5	56.2	43.7	0.3	0.1	0.3
Total	7,100	2,615,610	100.0	199,106	2.0	1.2	1.4	15.9	10.6	11.7	42.1	35.7	43.1	40.0	52.5	43.8	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Las Vegas MSA	1,997	862,645	77.4	81,010	2.4	1.8	2.2	15.7	16.5	15.7	42.7	35.6	40.1	39.0	46.0	41.8	0.2	0.2	0.1
Limited-Scope:																			
Reno CSA	583	392,576	22.6	19,592	2.0	1.5	1.8	12.0	11.0	11.7	44.9	33.1	43.5	40.1	53.3	42.1	0.9	1.0	1.0
Total	2,580	1,255,221	100.0	100,602	2.3	1.7	2.1	14.8	15.2	14.9	43.2	35.0	40.8	39.2	47.7	41.9	0.4	0.3	0.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Las Vegas MSA	5,619	1,818,306	79.1	155,149	20.7	6.1	5.0	18.4	17.7	14.3	20.5	20.6	20.5	40.5	51.9	37.7	0.0	3.7	22.6
Limited-Scope:																			
Reno CSA	1,481	797,304	20.9	43,957	20.8	5.4	5.0	17.2	15.9	16.1	20.7	17.0	22.6	41.3	57.2	40.3	0.0	4.5	16.0
Total	7,100	2,615,610	100.0	199,106	20.7	5.9	5.0	18.1	17.3	14.7	20.6	19.8	20.9	40.6	53.0	38.3	0.0	3.9	21.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Las Vegas MSA	1,997	862,645,284	77.4	81,010	20.9	7.4	5.2	18.0	17.1	14.6	20.2	18.4	21.8	40.9	51.3	39.5	0.0	5.8	18.8	
Limited-Scope:																				
Reno CSA	583	392,576,243	22.6	19,592	19.4	7.5	6.3	18.4	14.9	14.7	21.8	13.2	21.7	40.3	56.9	42.3	0.0	7.4	15.0	
Total	2,580	1,255,221,527	100.0	100,602	20.6	7.4	5.4	18.1	16.6	14.6	20.6	17.2	21.8	40.8	52.6	40.1	0.0	6.1	18.1	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Las Vegas MSA	15,555	399,217	83.7	73,338	3.8	2.3	3.0	20.8	13.9	18.4	38.7	36.9	38.8	36.1	46.5	39.4	0.6	0.4	0.4	
Limited-Scope:																				
Reno CSA	3,209	54,866	16.3	17,233	6.9	7.2	7.2	22.2	17.1	19.7	29.3	27.8	30.0	37.5	45.2	39.9	4.1	2.6	3.3	
Total	18,584	454,083	100.0	90,571	4.5	3.1	3.8	21.1	14.4	18.6	36.6	35.5	37.1	36.4	46.3	39.5	1.4	0.7	0.9	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Las Vegas MSA	27,137	392,490	81.9	70,409	3.6	2.0	3.2	27.5	17.9	21.4	32.6	33.2	35.2	36.0	46.7	39.9	0.3	0.2	0.2
Limited-Scope:																			
Reno CSA	6,001	81,860	18.1	16,932	4.0	3.0	3.8	18.6	14.5	15.5	33.8	32.2	37.5	36.9	46.0	37.5	6.7	4.3	5.7
Total	33,138	474,350	100.0	87,341	3.7	2.1	3.3	25.8	17.3	20.3	32.8	33.0	35.6	36.2	46.6	39.5	1.5	1.0	1.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Las Vegas MSA	15,555	399,217	83.7	73,338	86.8	62.8	43.6	4.3	14.7	8.9	22.5
Limited-Scope:											
Reno CSA	3,029	54,866	16.3	17,233	82.5	63.6	50.3	5.9	20.8	11.6	15.6
Total	18,584	454,083	100.0	90,571	85.9	62.9	44.8	4.7	15.7	9.5	21.4
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Las Vegas MSA	27,137	392,490	81.9	70,409	92.6	76.3	49.4	2.1	14.8	5.3	8.9
Limited-Scope:											
Reno CSA	6,001	81,860	18.1	16,932	89.2	68.6	51.8	3.3	20.2	7.4	11.2
Total	33,138	474,350	100.0	87,341	91.9	74.9	49.8	2.3	15.8	5.7	9.3
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Las Vegas MSA	45	525	65.2	99	2.1	4.4	0.0	19.7	17.8	12.1	39.9	33.3	46.5	38.2	44.4	41.4	0.2	0.0	0.0	
Limited-Scope:																				
Reno CSA	24	319	34.8	81	4.9	0.0	3.7	15.7	8.3	8.6	39.0	37.5	33.3	39.3	50.0	51.9	1.1	4.2	2.5	
Total	69	844	100.0	180	3.0	2.9	1.7	18.3	14.5	10.6	39.6	34.8	40.6	38.6	46.4	46.1	0.5	1.4	1.1	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Las Vegas MSA	107	1,238	60.8	111	3.9	0.0	0.9	25.3	25.2	20.7	33.8	34.6	33.3	36.9	40.2	45.0	0.1	0.0	0.0	
Limited-Scope:																				
Reno CSA	69	822	39.2	97	2.8	5.8	5.2	12.3	5.8	5.2	42.7	34.8	44.3	38.4	53.6	44.3	3.7	0.0	1.0	
Total	176	2,060	100.0	208	3.6	2.3	2.9	21.3	17.6	13.5	36.6	34.7	38.5	37.4	45.5	44.7	1.2	0.0	0.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Las Vegas MSA	45	525	65.2	99	94.4	75.6	67.7	3.4	6.7	2.2	17.8
Limited-Scope:											
Reno CSA	24	319	34.8	81	95.0	54.2	58.0	2.9	20.8	2.1	25.0
Total	69	844	100.0	180	94.6	68.1	63.3	3.2	11.6	2.2	20.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Las Vegas MSA	107	1,238	60.8	111	96.2	86.0	81.1	2.2	4.7	1.7	9.3
Limited-Scope:											
Reno CSA	69	822	39.2	97	95.9	69.6	61.9	2.0	13.0	2.0	17.4
Total	176	2,060	100.0	208	96.1	79.5	72.1	2.1	8.0	1.8	12.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Albuquerque CSA	757	193,786	100.0	35,228	2.8	1.3	2.2	28.4	13.2	22.5	28.6	25.0	29.1	40.1	60.1	46.0	0.2	0.4	0.1	
Total	757	193,786	100.0	35,228	2.8	1.3	2.2	28.4	13.2	22.5	28.6	25.0	29.1	40.1	60.1	46.0	0.2	0.4	0.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Albuquerque CSA	567	137,490	100.0	19,208	3.3	4.2	2.9	21.5	25.8	21.2	39.5	37.0	38.3	34.7	31.6	36.7	1.0	1.4	0.9	
Total	567	137,490	100.0	19,208	3.3	4.2	2.9	21.5	25.8	21.2	39.5	37.0	38.3	34.7	31.6	36.7	1.0	1.4	0.9	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Albuquerque CSA	757	193,786	100.0	35,228	25.1	2.6	4.2	15.3	12.3	15.1	17.8	17.6	20.7	41.8	63.3	41.0	0.0	4.2	19.0
Total	757	193,786	100.0	35,228	25.1	2.6	4.2	15.3	12.3	15.1	17.8	17.6	20.7	41.8	63.3	41.0	0.0	4.2	19.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Albuquerque CSA	567	137,490	100.0	19,208	23.2	7.8	5.3	16.0	21.7	17.8	18.9	21.0	23.9	41.9	44.3	38.4	0.0	5.3	14.7
Total	567	137,490	100.0	19,208	23.2	7.8	5.3	16.0	21.7	17.8	18.9	21.0	23.9	41.9	44.3	38.4	0.0	5.3	14.7
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Albuquerque CSA	2,498	27,555	100.0	14,099	10.3	9.8	11.6	25.0	19.8	27.5	28.8	25.1	27.2	35.0	44.8	33.2	0.8	0.4	0.5		
Total	2,498	27,555	100.0	14,099	10.3	9.8	11.6	25.0	19.8	27.5	28.8	25.1	27.2	35.0	44.8	33.2	0.8	0.4	0.5		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Albuquerque CSA	4,941	60,037	100.0	13,600	11.0	7.6	9.0	23.4	19.8	26.1	32.5	32.0	34.0	31.1	40.0	30.3	2.1	0.6	0.6		
Total	4,941	60,037	100.0	13,600	11.0	7.6	9.0	23.4	19.8	26.1	32.5	32.0	34.0	31.1	40.0	30.3	2.1	0.6	0.6		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Albuquerque CSA	2,498	27,555	100.0	14,099	88.4	65.4	48.8	3.5	21.1	8.1	13.5
Total	2,498	27,555	100.0	14,099	88.4	65.4	48.8	3.5	21.1	8.1	13.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Albuquerque CSA	4,941	60,037	100.0	13,600	92.2	68.9	54.6	2.2	19.3	5.5	11.7
Total	4,941	60,037	100.0	13,600	92.2	68.9	54.6	2.2	19.3	5.5	11.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Albuquerque CSA	13	128	100.0	34	5.8	0.0	5.9	27.5	15.4	29.4	27.4	53.8	35.3	39.2	30.8	29.4	0.2	0.0	0.0
Total	13	128	100.0	34	5.8	0.0	5.9	27.5	15.4	29.4	27.4	53.8	35.3	39.2	30.8	29.4	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Albuquerque CSA	50	527	100.0	46	6.3	4.0	2.2	21.5	18.0	10.9	39.3	16.0	41.3	31.6	62.0	45.7	1.3	0.0	0.0
Total	50	527	100.0	46	6.3	4.0	2.2	21.5	18.0	10.9	39.3	16.0	41.3	31.6	62.0	45.7	1.3	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Albuquerque CSA	13	128	100.0	34	96.2	53.8	58.8	2.1	23.1	1.7	23.1	
Total	13	128	100.0	34	96.2	53.8	58.8	2.1	23.1	1.7	23.1	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%												

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Albuquerque CSA	50	527	100.0	46	97.3	86.0	78.3	1.4	2.0	1.4	12.0
Total	50	527	100.0	46	97.3	86.0	78.3	1.4	2.0	1.4	12.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Rochester MSA	1,028	185,718	27.5	39,071	3.8	1.8	3.0	11.9	8.2	10.8	48.0	39.0	46.5	36.2	51.1	39.7	0.0	0.0	0.0
Syracuse MSA	715	123,380	19.1	21,325	2.6	0.8	2.0	14.0	9.7	12.8	51.7	46.4	49.4	31.6	43.1	35.8	0.1	0.0	0.1
Limited-Scope:																			
Albany MSA	981	232,795	26.3	35,483	3.0	2.2	2.9	12.6	8.9	12.6	55.3	54.7	54.7	29.1	34.1	29.6	0.0	0.0	0.1
Binghamton MSA	93	13,700	2.5	5,217	3.4	1.1	3.1	12.1	9.7	12.3	58.1	57.0	54.9	26.3	32.3	29.7	0.0	0.0	0.0
Buffalo MSA	659	131,801	17.6	32,113	7.4	1.8	4.3	11.2	7.3	9.0	41.8	38.8	42.2	39.6	51.7	44.4	0.0	0.3	0.1
Ithaca MSA	48	12,818	1.3	2,107	0.0	0.0	0.0	12.2	6.3	10.9	70.6	64.6	68.6	17.0	29.2	19.4	0.2	0.0	1.1
Non-MSA NY	213	50,509	5.7	2,656	0.0	0.0	0.0	13.2	12.7	13.6	67.2	66.7	62.1	19.6	20.7	24.4	0.0	0.0	0.0
Total	3,737	750,721	100.0	137,972	4.2	1.6	3.0	12.3	8.8	11.3	50.1	46.9	49.0	33.4	42.7	36.6	0.0	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Rochester MSA	688	128,254	21.1	29,268	4.5	5.4	5.5	15.5	17.3	16.1	43.9	42.7	42.2	35.9	34.2	35.9	0.2	0.4	0.2
Syracuse MSA	568	98,753	17.4	15,521	2.3	3.2	2.3	15.6	17.4	15.8	49.5	44.4	47.6	32.2	34.7	33.7	0.4	0.4	0.6
Limited-Scope:																			
Albany MSA	868	211,793	26.6	24,727	3.7	5.3	4.7	10.0	14.4	11.8	52.4	47.1	50.2	33.6	32.6	32.9	0.3	0.6	0.5
Binghamton MSA	324	47,707	9.9	4,043	1.4	1.5	1.3	17.4	21.9	17.9	48.8	44.4	45.4	32.3	31.5	35.1	0.1	0.6	0.3
Buffalo MSA	640	136,220	19.6	23,601	5.8	3.9	4.6	12.1	11.3	11.2	46.4	50.8	46.2	35.2	33.4	37.6	0.4	0.6	0.4
Ithaca MSA	46	12,738	1.4	1,455	0.0	0.0	0.0	12.3	13.0	11.6	69.6	67.4	65.8	17.7	19.6	21.6	0.4	0.0	1.0
Non-MSA NY	133	38,433	4.1	2,249	0.0	0.0	0.0	10.9	11.3	13.8	55.6	45.9	51.8	31.4	40.6	32.1	2.2	2.3	2.4
Total	3,267	673,898	100.0	100,864	3.9	4.0	4.2	13.4	15.5	13.8	48.5	46.4	46.6	33.9	33.5	34.9	0.3	0.6	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Rochester MSA	1,028	185,718	27.5	39,071	21.6	8.3	9.4	16.8	22.8	22.2	19.8	22.7	22.5	41.8	40.0	33.3	0.0	6.3	12.6	
Syracuse MSA	715	123,380	19.1	21,325	21.8	8.1	9.0	17.2	23.8	20.8	20.4	22.9	23.1	40.6	40.4	35.0	0.0	4.8	12.1	
Limited-Scope:																				
Albany MSA	981	232,795	26.3	35,483	20.0	9.1	8.6	17.6	27.8	22.6	22.1	23.5	24.6	40.3	34.5	32.6	0.0	5.1	11.6	
Binghamton MSA	93	13,700	2.5	5,217	22.6	5.4	7.4	17.6	20.4	19.7	21.0	28.0	22.7	38.8	39.8	34.2	0.0	6.5	16.1	
Buffalo MSA	659	131,801	17.6	32,113	22.1	5.2	7.4	16.5	21.5	20.2	19.9	22.5	23.0	41.6	46.6	35.4	0.0	4.2	14.0	
Ithaca MSA	48	12,818	1.3	2,107	21.0	4.2	7.3	16.7	10.4	18.7	21.2	25.0	23.6	41.0	60.4	42.6	0.0	0.0	7.8	
Non-MSA NY	213	50,509	5.7	2,656	20.5	3.3	2.8	16.5	12.7	10.7	21.3	14.1	19.9	41.8	64.3	55.6	0.0	5.6	11.0	
Total	3,737	750,721	100.0	137,972	21.5	7.5	8.4	17.0	23.3	21.2	20.5	22.6	23.2	41.0	41.4	34.5	0.0	5.2	12.6	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Rochester MSA	688	128,254	21.1	29,268	21.1	14.4	10.4	17.4	25.3	22.2	20.2	26.6	22.3	41.4	29.9	31.3	0.0	3.8	13.9
Syracuse MSA	568	98,753	17.4	15,521	21.9	13.6	11.2	17.4	24.6	23.3	20.6	29.4	24.3	40.1	29.4	31.4	0.0	3.0	9.8
Limited-Scope:																			
Albany MSA	868	211,793	26.6	24,727	21.0	12.0	10.7	17.1	30.0	24.0	21.8	28.1	25.4	40.1	28.2	29.9	0.0	1.7	10.1
Binghamton MSA	324	47,707	9.9	4,043	22.6	10.5	9.8	17.8	29.9	22.8	19.9	21.0	22.1	39.8	36.4	33.0	0.0	2.2	12.3
Buffalo MSA	640	136,220	19.6	23,601	22.2	9.8	8.9	16.3	28.1	22.4	20.6	25.3	23.6	40.9	33.6	32.4	0.0	3.1	12.7
Ithaca MSA	46	12,738	1.4	1,455	19.8	8.7	8.0	19.6	19.6	22.5	20.8	30.4	22.5	39.8	39.1	39.1	0.0	2.2	7.8
Non-MSA NY	133	38,433	4.1	2,249	20.7	5.3	5.3	15.7	10.5	12.4	19.6	15.8	20.9	44.0	63.2	50.7	0.0	5.3	10.7
Total	3,267	673,898	100.0	100,864	21.5	11.9	10.1	17.1	26.8	22.7	20.7	26.3	23.6	40.7	32.2	31.8	0.0	2.8	11.8
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Rochester MSA	4,527	92,985	34.5	20,984	10.4	7.7	9.2	13.2	9.1	11.6	39.9	38.9	41.2	36.3	44.1	37.9	0.2	0.1	0.1		
Syracuse MSA	2,190	68,874	16.7	13,299	8.1	6.4	6.5	14.0	13.1	13.3	42.4	40.5	45.0	33.3	38.4	33.3	2.2	1.5	1.9		
Limited-Scope:																					
Albany MSA	2,885	33,173	22.0	19,331	13.6	10.9	11.1	12.1	8.1	11.3	45.8	46.2	47.2	28.1	34.8	30.1	0.4	0.0	0.3		
Binghamton MSA	298	2,811	2.3	3,332	11.7	8.1	9.2	14.3	12.1	15.5	54.8	55.4	56.6	19.1	24.5	18.7	0.0	0.0	0.0		
Buffalo MSA	2,519	27,779	19.2	22,015	10.9	6.1	10.4	11.3	9.4	10.7	33.4	32.0	33.5	39.6	50.5	42.2	4.8	2.1	3.1		
Ithaca MSA	263	2,978	2.0	2,234	0.0	0.0	0.0	15.5	16.0	16.1	48.4	44.1	49.6	33.6	37.3	31.2	2.6	2.7	3.1		
Non-MSA NY	457	7,913	3.5	1,780	0.0	0.0	0.0	26.2	19.7	22.0	54.5	55.4	56.3	19.3	24.9	21.6	0.0	0.0	0.0		
Total	13,139	236,513	100.0	82,975	10.6	7.5	9.1	13.0	10.2	12.1	41.3	40.5	42.4	33.4	41.1	35.2	1.7	0.7	1.3		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Rochester MSA	6,819	88,112	29.3	18,054	6.9	4.0	5.4	16.2	12.8	15.7	39.0	37.3	41.9	35.0	44.6	34.9	2.9	1.3	2.1
Syracuse MSA	3,114	50,559	13.4	11,724	7.0	4.7	5.5	14.5	14.0	16.6	42.1	41.8	44.9	29.6	35.3	29.0	6.7	4.3	4.1
Limited-Scope:																			
Albany MSA	6,146	70,030	26.4	19,302	6.6	4.9	6.9	9.1	7.7	9.2	41.3	42.5	47.9	25.1	33.2	29.1	17.9	11.8	6.8
Binghamton MSA	656	7,545	2.8	2,929	13.6	9.6	9.9	17.0	16.3	17.6	39.3	37.7	41.9	28.8	34.1	29.6	1.3	2.3	1.1
Buffalo MSA	5,168	58,563	22.2	18,079	9.2	5.7	8.6	13.1	9.7	12.7	39.9	38.8	40.3	34.0	44.4	36.3	3.8	1.4	2.1
Ithaca MSA	545	6,564	2.3	2,061	0.0	0.0	0.0	17.3	11.6	15.9	45.7	51.4	52.0	20.0	23.9	20.4	17.0	13.2	11.7
Non-MSA NY	827	12,560	3.6	1,977	0.0	0.0	0.0	18.0	20.0	15.0	53.5	51.3	55.6	26.8	27.2	27.2	1.8	1.6	2.3
Total	23,275	293,933	100.0	74,126	7.3	4.6	6.5	13.3	11.2	13.5	40.9	40.4	44.2	30.3	38.9	32.0	8.2	4.8	3.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rochester MSA	4,527	92,985	34.5	20,984	85.6	61.9	40.4	4.8	15.9	9.6	22.2
Syracuse MSA	2,190	68,874	16.7	13,299	83.7	57.0	42.2	5.0	17.2	11.3	25.8
Limited-Scope:											
Albany MSA	2,885	33,173	22.0	19,331	85.8	68.3	41.7	4.1	16.7	10.1	15.0
Binghamton MSA	298	2,811	2.3	3,332	82.5	60.1	42.6	5.1	19.1	12.4	20.8
Buffalo MSA	2,519	27,779	19.2	22,015	84.8	65.9	43.6	5.1	20.4	10.1	13.7
Ithaca MSA	263	2,978	2.0	2,234	84.6	70.7	53.9	4.0	10.3	11.4	19.0
Non-MSA NY	457	7,913	3.5	1,780	87.4	67.2	42.8	3.2	10.9	9.4	21.9
Total	13,139	236,513	100.0	82,975	85.0	63.6	42.3	4.7	16.9	10.3	19.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Rochester MSA	6,819	88,112	29.3	18,054	88.4	72.3	49.8	3.7	15.0	7.9	12.7
Syracuse MSA	3,114	50,559	13.4	11,724	86.6	69.0	50.3	3.9	17.3	9.5	13.6
Limited-Scope:											
Albany MSA	6,146	70,030	26.4	19,302	90.1	74.4	48.3	2.7	13.6	7.2	12.0
Binghamton MSA	656	7,545	2.8	2,929	85.8	72.0	49.9	4.1	16.5	10.1	11.6
Buffalo MSA	5,168	58,563	22.2	18,079	88.2	69.8	49.1	3.8	17.2	8.0	13.0
Ithaca MSA	545	6,564	2.3	2,061	87.5	75.0	48.3	3.1	12.5	9.4	12.5
Non-MSA NY	827	12,560	3.6	1,977	91.1	79.9	49.9	2.2	11.7	6.7	8.3
Total	23,275	293,933	100.0	74,126	88.5	72.2	49.3	3.5	15.3	8.1	12.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Rochester MSA	70	1,644	28.3	252	2.8	0.0	0.0	9.5	5.7	11.1	56.7	55.7	69.0	31.0	38.6	19.8	0.0	0.0	0.0	
Syracuse MSA	60	535	24.3	235	2.0	10.0	2.6	12.7	13.3	15.7	50.9	43.3	49.8	33.8	33.3	31.1	0.6	0.0	0.9	
Limited-Scope:																				
Albany MSA	55	509	22.3	132	2.4	0.0	1.5	7.5	14.5	7.6	65.9	67.3	69.7	24.2	18.2	21.2	0.0	0.0	0.0	
Binghamton MSA	3	34	1.2	43	2.8	0.0	0.0	8.0	0.0	2.3	73.5	100.0	95.3	15.7	0.0	2.3	0.0	0.0	0.0	
Buffalo MSA	30	182	12.1	154	4.4	13.3	3.2	5.1	0.0	2.6	42.1	30.0	66.2	46.7	56.7	27.9	1.7	0.0	0.0	
Ithaca MSA	12	89	4.9	43	0.0	0.0	0.0	12.4	25.0	18.6	73.5	50.0	79.1	13.8	25.0	2.3	0.3	0.0	0.0	
Non-MSA NY	17	175	6.9	24	0.0	0.0	0.0	12.1	23.5	20.8	71.0	70.6	75.0	16.9	5.9	4.2	0.0	0.0	0.0	
Total	247	3,168	100.0	883	2.7	4.0	1.5	8.9	10.9	10.5	56.7	53.4	65.5	31.3	31.6	22.3	0.5	0.0	0.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Rochester MSA	148	1,583	36.0	299	2.4	0.0	0.0	13.4	9.5	17.4	50.8	56.8	63.5	32.7	33.8	19.1	0.7	0.0	0.0	
Syracuse MSA	81	856	19.7	206	2.0	2.5	1.5	14.1	12.3	17.5	53.2	53.1	61.7	29.7	32.1	18.9	1.1	0.0	0.5	
Limited-Scope:																				
Albany MSA	67	668	16.3	95	2.0	0.0	1.1	5.7	9.0	2.1	60.6	46.3	62.1	27.5	44.8	33.7	4.3	0.0	1.1	
Binghamton MSA	10	110	2.4	32	3.7	0.0	0.0	12.7	40.0	12.5	59.3	20.0	81.3	24.0	40.0	6.3	0.2	0.0	0.0	
Buffalo MSA	57	511	13.9	156	3.9	3.5	1.3	8.5	10.5	5.8	47.0	35.1	62.8	39.4	49.1	29.5	1.2	1.8	0.6	
Ithaca MSA	30	311	7.3	31	0.0	0.0	0.0	16.2	20.0	25.8	69.8	73.3	71.0	11.2	6.7	3.2	2.9	0.0	0.0	
Non-MSA NY	18	164	4.4	28	0.0	0.0	0.0	11.3	16.7	7.1	54.2	38.9	60.7	33.0	44.4	28.6	1.6	0.0	3.6	
Total	411	4,203	100.0	847	2.4	1.0	0.7	10.6	11.9	13.3	54.1	50.9	63.6	31.0	36.0	21.8	1.9	0.2	0.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rochester MSA	70	1,644	28.3	252	95.8	68.6	38.9	2.8	17.1	1.5	14.3
Syracuse MSA	60	535	24.3	235	95.8	78.3	47.7	2.4	15.0	1.8	6.7
Limited-Scope:											
Albany MSA	55	509	22.3	132	97.4	83.6	49.2	1.6	3.6	1.0	12.7
Binghamton MSA	3	34	1.2	43	97.4	100.0	46.5	1.5	0.0	1.0	0.0
Buffalo MSA	30	182	12.1	154	96.2	86.7	37.0	2.3	10.0	1.5	3.3
Ithaca MSA	12	89	4.9	43	95.9	50.0	27.9	2.8	25.0	1.4	25.0
Non-MSA NY	17	175	6.9	24	97.9	70.6	58.3	2.1	11.8	0.0	17.6
Total	247	3,168	100.0	883	96.4	76.1	42.8	2.2	12.6	1.4	11.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Rochester MSA	148	1,583	36.0	299	96.1	61.5	47.5	2.4	25.0	1.5	13.5
Syracuse MSA	81	856	19.7	206	96.3	55.6	46.6	2.2	13.6	1.5	30.9
Limited-Scope:											
Albany MSA	67	668	16.3	95	97.8	79.1	66.3	1.2	10.4	1.0	10.4
Binghamton MSA	10	110	2.4	32	97.4	100.0	53.1	1.5	0.0	1.1	0.0
Buffalo MSA	57	511	13.9	156	96.6	71.9	43.6	2.0	12.3	1.4	15.8
Ithaca MSA	30	311	7.3	31	96.2	73.3	51.6	2.4	20.0	1.4	6.7
Non-MSA NY	18	164	4.4	28	98.2	77.8	67.9	1.6	22.2	0.3	0.0
Total	411	4,203	100.0	847	96.8	67.2	49.7	1.9	17.5	1.3	15.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Raleigh CSA	3,799	1,294,102	97.1	124,065	2.4	1.4	2.4	17.2	10.8	14.8	34.9	27.9	33.5	45.5	59.9	49.3	0.0	0.0	0.0
Limited-Scope:																			
Greenville MSA	115	25,169	2.9	7,847	4.5	8.7	5.8	19.5	6.1	11.1	40.3	38.3	43.0	35.7	47.0	40.1	0.0	0.0	0.0
Total	3,914	1,319,271	100.0	131,912	2.6	1.6	2.6	17.5	10.7	14.6	35.4	28.2	34.1	44.6	59.5	48.8	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Raleigh CSA	1,699	695,778	97.8	69,381	3.4	5.8	3.6	15.1	19.1	15.8	35.4	33.8	37.4	45.3	40.2	42.2	0.9	1.2	1.0	
Limited-Scope:																				
Greenville MSA	39	7,857	2.2	5,035	1.4	0.0	1.2	10.3	15.4	10.4	54.9	46.2	53.2	31.0	38.5	33.4	2.4	0.0	1.7	
Total	1,738	703,635	100.0	74,416	3.2	5.6	3.4	14.7	19.0	15.4	37.1	34.1	38.5	44.0	40.2	41.6	1.0	1.2	1.0	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Raleigh CSA	3,799	1,294,102	97.1	124,065	20.7	3.2	5.1	16.2	12.2	14.7	18.4	18.5	19.9	44.7	60.2	46.5	0.0	5.9	13.9
Limited-Scope:																			
Greenville MSA	115	25,169	2.9	7,847	24.2	2.6	2.5	16.2	1.7	11.4	17.5	27.0	19.8	42.1	60.0	47.6	0.0	8.7	18.6
Total	3,914	1,319,271	100.0	131,912	21.1	3.1	4.9	16.2	11.9	14.5	18.3	18.7	19.9	44.4	60.2	46.5	0.0	6.0	14.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Raleigh CSA	1,699	695,778	97.8	69,381	20.3	6.9	6.4	15.7	20.4	15.9	19.7	20.2	22.6	44.3	48.9	44.8	0.0	3.6	10.2
Limited-Scope:																			
Greenville MSA	39	7,857	2.2	5,035	21.9	7.7	4.7	17.7	10.3	15.0	19.4	12.8	21.5	41.1	56.4	43.5	0.0	12.8	15.3
Total	1,738	703,635	100.0	74,416	20.4	6.9	6.3	15.9	20.1	15.9	19.7	20.1	22.6	44.0	49.1	44.7	0.0	3.8	10.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Raleigh CSA	6,526	75,052	96.9	53,551	4.7	3.3	4.4	18.5	13.3	18.3	32.1	28.2	33.2	44.2	55.0	43.8	0.6	0.2	0.3
Limited-Scope:																			
Greenville MSA	211	3,459	3.1	3,586	16.1	17.5	13.3	16.0	11.4	16.0	36.9	32.2	38.9	31.0	38.9	31.8	0.0	0.0	0.0
Total	6,737	78,511	100.0	57,137	5.4	3.7	5.0	18.4	13.2	18.1	32.4	28.4	33.6	43.3	54.5	43.0	0.5	0.2	0.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Raleigh CSA	16,636	191,698	96.9	50,796	5.6	2.9	5.0	16.2	11.4	16.2	34.3	31.0	34.4	42.6	53.1	42.9	1.4	1.7	1.4
Limited-Scope:																			
Greenville MSA	538	7,219	3.1	3,515	3.9	3.0	2.4	17.7	18.8	14.9	43.0	44.4	47.3	30.5	31.0	30.5	4.9	2.8	4.9
Total	17,174	198,917	100.0	54,311	5.4	2.9	4.9	16.3	11.6	16.1	34.9	31.4	35.2	41.8	52.4	42.1	1.6	1.8	1.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Raleigh CSA	6,526	75,052	96.9	53,551	89.2	74.2	47.3	3.1	13.7	7.7	12.1
Limited-Scope:											
Greenville MSA	211	3,459	3.1	3,586	86.5	61.1	49.9	3.4	24.2	10.1	14.7
Total	6,737	78,511	100.0	57,137	89.0	73.8	47.5	3.1	14.0	7.9	12.2
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Raleigh CSA	16,636	191,698	96.9	50,796	92.2	76.9	52.0	2.0	11.6	5.8	11.5
Limited-Scope:											
Greenville MSA	538	7,219	3.1	3,515	90.3	70.8	54.8	2.2	19.3	7.5	9.9
Total	17,174	198,917	100.0	54,311	92.1	76.7	52.2	2.0	11.8	5.9	11.5
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Raleigh CSA	50	485	79.4	343	3.0	2.0	1.2	16.0	14.0	18.4	44.6	34.0	54.5	36.4	50.0	25.9	0.1	0.0	0.0	
Limited-Scope:																				
Greenville MSA	13	147	20.6	109	4.9	15.4	1.8	15.9	15.4	16.5	43.5	23.1	48.6	35.7	46.2	33.0	0.0	0.0	0.0	
Total	63	632	100.0	452	3.2	4.8	1.3	16.0	14.3	17.9	44.5	31.7	53.1	36.3	49.2	27.7	0.1	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Raleigh CSA	149	1,508	91.4	271	6.0	4.0	2.6	16.5	14.8	22.5	39.5	34.2	40.6	36.8	46.3	33.6	1.2	0.7	0.7	
Limited-Scope:																				
Greenville MSA	14	95	8.6	61	1.3	0.0	0.0	9.1	0.0	0.0	58.0	57.1	68.9	29.3	42.9	29.5	2.3	0.0	1.6	
Total	163	1,603	100.0	332	5.5	3.7	2.1	15.8	13.5	18.4	41.3	36.2	45.8	36.1	46.0	32.8	1.3	0.6	0.9	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Raleigh CSA	50	485	79.4	343	96.2	86.0	59.8	2.1	2.0	1.7	12.0
Limited-Scope:											
Greenville MSA	13	147	20.6	109	95.8	46.2	33.9	2.8	23.1	1.5	30.8
Total	63	632	100.0	452	96.1	77.8	53.5	2.2	6.3	1.7	15.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Raleigh CSA	149	1,508	91.4	271	97.2	82.6	58.7	1.3	2.7	1.5	14.8
Limited-Scope:											
Greenville MSA	14	95	8.6	61	97.7	42.9	54.1	1.4	14.3	0.9	42.9
Total	163	1,603	100.0	332	97.2	79.1	57.8	1.3	3.7	1.4	17.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	158	42,351	100.0	10,341	0.0	0.0	0.0	16.6	7.6	11.9	40.1	20.3	26.8	42.5	71.5	60.3	0.8	0.6	0.9
Total	158	42,351	100.0	10,341	0.0	0.0	0.0	16.6	7.6	11.9	40.1	20.3	26.8	42.5	71.5	60.3	0.8	0.6	0.9
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	56	16,144	100.0	5,412	1.9	3.6	2.6	13.2	10.7	9.6	49.0	39.3	38.2	35.9	46.4	49.7	0.0	0.0	0.0
Total	56	16,144	100.0	5,412	1.9	3.6	2.6	13.2	10.7	9.6	49.0	39.3	38.2	35.9	46.4	49.7	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	158	42,351	100.0	10,341	18.4	5.7	6.6	19.5	14.6	19.6	21.9	32.9	20.4	40.2	44.9	29.7	0.0	1.9	23.7
Total	158	42,351	100.0	10,341	18.4	5.7	6.6	19.5	14.6	19.6	21.9	32.9	20.4	40.2	44.9	29.7	0.0	1.9	23.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	56	16,144	100.0	5,412	18.4	5.4	8.1	18.5	30.4	20.8	22.7	30.4	22.1	40.4	30.4	32.4	0.0	3.6	16.6
Total	56	16,144	100.0	5,412	18.4	5.4	8.1	18.5	30.4	20.8	22.7	30.4	22.1	40.4	30.4	32.4	0.0	3.6	16.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Fargo CSA	542	6,326	100.0	6,039	0.0	0.0	0.0	31.9	25.6	31.7	27.3	22.3	24.2	40.2	51.8	43.7	0.6	0.2	0.4	
Total	542	6,326	100.0	6,039	0.0	0.0	0.0	31.9	25.6	31.7	27.3	22.3	24.2	40.2	51.8	43.7	0.6	0.2	0.4	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Fargo CSA	1,160	15,202	100.0	5,240	10.8	9.7	10.2	23.2	17.8	25.0	38.4	35.4	33.5	27.5	37.2	31.3	0.0	0.0	0.0		
Total	1,160	15,202	100.0	5,240	10.8	9.7	10.2	23.2	17.8	25.0	38.4	35.4	33.5	27.5	37.2	31.3	0.0	0.0	0.0		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Fargo CSA	542	6,326	100.0	6,039	84.3	66.6	44.5	5.5	22.0	10.1	11.4
Total	542	6,326	100.0	6,039	84.3	66.6	44.5	5.5	22.0	10.1	11.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Fargo CSA	1,160	15,202	100.0	5,240	88.4	67.8	47.6	3.9	20.9	7.7	11.4
Total	1,160	15,202	100.0	5,240	88.4	67.8	47.6	3.9	20.9	7.7	11.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	25	330	100.0	381	0.0	0.0	0.0	12.0	0.0	2.6	55.0	48.0	70.6	32.9	52.0	26.8	0.1	0.0	0.0
Total	25	330	100.0	381	0.0	0.0	0.0	12.0	0.0	2.6	55.0	48.0	70.6	32.9	52.0	26.8	0.1	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Fargo CSA	38	430	100.0	273	3.9	0.0	0.0	9.5	5.3	2.2	58.8	47.4	74.4	27.9	47.4	23.4	0.0	0.0	0.0
Total	38	430	100.0	273	3.9	0.0	0.0	9.5	5.3	2.2	58.8	47.4	74.4	27.9	47.4	23.4	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Fargo CSA	25	330	100.0	381	96.8	56.0	55.4	2.6	20.0	0.6	24.0
Total	25	330	100.0	381	96.8	56.0	55.4	2.6	20.0	0.6	24.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Fargo CSA	38	430	100.0	273	97.7	68.4	47.3	1.9	21.1	0.5	10.5
Total	38	430	100.0	273	97.7	68.4	47.3	1.9	21.1	0.5	10.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Columbus CSA	11,491	2,705,295	46.3	133,077	5.2	3.2	4.7	18.7	11.6	15.9	39.2	28.7	35.4	36.8	56.4	44.0	0.0	0.0	0.0		
Limited-Scope:																					
Cleveland CSA	8,965	1,683,103	36.1	164,571	5.6	2.2	3.1	15.2	8.6	12.4	44.8	40.8	43.7	34.2	48.3	40.8	0.1	0.0	0.0		
Dayton MSA	1,776	289,702	7.2	50,954	4.8	1.4	2.5	15.9	10.8	13.1	46.0	40.5	45.3	33.3	47.3	39.2	0.0	0.0	0.0		
Lima CSA	320	45,078	1.3	6,416	1.4	0.3	1.0	8.1	5.6	7.6	46.0	45.9	46.7	44.5	48.1	44.8	0.0	0.0	0.0		
Mansfield CSA	277	35,420	1.1	6,578	1.5	0.0	0.5	12.3	11.6	9.5	64.3	60.7	65.1	22.0	27.8	24.8	0.0	0.0	0.0		
Toledo CSA	676	118,621	2.7	26,100	6.4	1.2	1.8	12.6	6.2	8.3	42.5	29.3	40.5	38.4	63.3	49.3	0.0	0.0	0.0		
Weirton MSA	42	4,580	0.2	1,902	2.5	2.4	0.9	8.2	11.9	7.2	78.4	69.0	76.8	10.9	16.7	15.1	0.0	0.0	0.0		
Youngstown CSA	928	123,886	3.7	20,443	4.6	0.8	0.8	12.1	4.6	7.4	55.7	52.0	57.6	27.6	42.6	34.2	0.0	0.0	0.0		
Non-MSA OH	343	46,541	1.4	4,252	0.0	0.0	0.0	13.2	16.3	12.6	71.4	67.3	70.3	15.1	15.7	16.6	0.3	0.6	0.5		
Total	24,818	5,052,226	100.0	414,293	5.1	2.5	3.2	15.4	10.0	13.0	45.6	36.0	42.5	33.9	51.5	41.2	0.1	0.0	0.0		
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Columbus CSA	3,301	958,751	37.5	79,480	4.5	6.6	5.5	18.8	18.4	17.2	40.1	33.1	38.4	36.4	41.6	38.5	0.2	0.3	0.4	
Limited-Scope:																				
Cleveland CSA	3,237	684,420	36.7	106,921	5.0	4.9	4.2	14.9	15.9	14.3	43.6	41.4	43.4	35.9	37.6	37.9	0.6	0.2	0.4	
Dayton MSA	841	142,474	9.5	31,868	4.8	4.4	3.5	15.4	16.2	15.4	43.8	43.3	43.4	35.8	35.9	37.6	0.2	0.2	0.1	
Lima CSA	185	25,145	2.1	4,581	2.6	3.8	1.8	9.4	16.8	12.7	48.5	47.0	50.4	39.5	32.4	35.1	0.0	0.0	0.0	
Mansfield CSA	127	16,561	1.4	4,837	4.7	7.9	4.6	7.4	7.1	8.6	68.2	67.7	65.6	19.7	17.3	21.2	0.0	0.0	0.0	
Toledo CSA	367	61,801	4.2	16,888	4.6	3.3	2.4	15.1	13.4	13.5	38.5	39.8	37.7	39.9	42.5	45.4	1.9	1.1	1.1	
Weirton MSA	30	3,797	0.3	1,454	0.6	0.0	0.4	6.2	3.3	4.8	86.6	86.7	83.6	6.6	10.0	11.2	0.0	0.0	0.0	
Youngstown CSA	550	68,807	6.2	15,529	3.4	3.3	1.4	15.5	16.0	12.8	59.0	56.7	60.0	21.6	23.3	25.4	0.4	0.7	0.3	
Non-MSA OH	176	23,304	2.0	3,108	0.0	0.0	0.3	19.8	13.6	17.8	68.7	72.2	68.6	11.3	14.2	12.9	0.2	0.0	0.4	
Total	8,814	1,985,060	100.0	264,666	4.5	5.2	4.1	15.7	16.6	15.0	45.1	40.6	43.6	34.2	37.3	37.0	0.5	0.3	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Columbus CSA	11,491	2,705,295	46.3	133,077	22.5	7.3	7.2	17.2	19.5	18.3	19.7	18.5	20.4	40.7	35.6	37.4	0.0	19.1	16.7	
Limited-Scope:																				
Cleveland CSA	8,965	1,683,103	36.1	164,571	21.7	8.8	9.2	17.1	22.3	19.6	20.1	22.6	21.7	41.0	42.5	34.9	0.0	3.8	14.6	
Dayton MSA	1,776	289,702	7.2	50,954	21.8	10.8	7.9	17.0	22.1	18.8	20.0	21.1	20.9	41.1	41.6	33.2	0.0	4.4	19.2	
Lima CSA	320	45,078	1.3	6,416	17.5	9.4	6.5	16.8	28.8	20.1	21.1	27.2	23.4	44.5	29.1	34.1	0.0	5.6	16.0	
Mansfield CSA	277	35,420	1.1	6,578	19.8	10.1	6.8	18.1	22.7	20.3	22.0	28.2	23.7	40.2	33.6	34.2	0.0	5.4	14.9	
Toledo CSA	676	118,621	2.7	26,100	22.7	6.7	7.0	16.3	15.5	19.1	19.5	20.6	22.6	41.5	53.3	39.3	0.0	4.0	12.1	
Weirton MSA	42	4,580	0.2	1,902	19.6	11.9	4.4	18.8	26.2	17.6	21.8	21.4	22.9	39.8	38.1	36.0	0.0	2.4	19.1	
Youngstown CSA	928	123,886	3.7	20,443	21.1	8.1	8.1	18.2	22.6	21.5	20.7	23.7	22.6	40.0	40.9	32.5	0.0	4.6	15.3	
Non-MSA OH	343	46,541	1.4	4,252	21.6	11.4	6.2	19.0	22.4	18.5	20.9	26.2	23.4	38.5	35.9	35.7	0.0	4.1	16.3	
Total	24,818	5,052,226	100.0	414,293	21.8	8.2	8.1	17.2	20.9	19.1	20.1	20.7	21.4	40.9	39.1	35.6	0.0	11.0	15.8	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Columbus CSA	3,301	958,751	37.5	79,480	21.8	12.5	8.9	17.7	22.1	19.7	20.6	19.2	21.4	40.0	28.8	34.5	0.0	17.4	15.5
Limited-Scope:																			
Cleveland CSA	3,237	684,420	36.7	106,921	21.3	13.5	9.7	17.5	26.7	21.5	20.3	23.2	21.6	40.9	32.6	33.2	0.0	4.1	14.0
Dayton MSA	841	142,474	9.5	31,868	20.9	15.8	10.2	17.0	29.5	20.9	21.0	20.9	23.1	41.1	28.8	30.9	0.0	5.0	14.9
Lima CSA	185	25,145	2.1	4,581	16.0	15.7	9.9	16.7	31.9	25.3	22.7	23.2	23.8	44.7	24.3	29.3	0.0	4.9	11.8
Mansfield CSA	127	16,561	1.4	4,837	19.2	15.0	9.9	17.8	29.1	22.0	22.8	24.4	24.3	40.2	22.0	29.3	0.0	9.4	14.4
Toledo CSA	367	61,801	4.2	16,888	22.2	12.5	9.9	16.4	27.2	22.4	20.0	20.2	23.0	41.4	36.5	34.0	0.0	3.5	10.7
Weirton MSA	30	3,797	0.3	1,454	21.6	13.3	8.7	17.4	26.7	23.1	22.3	13.3	23.9	38.7	33.3	27.2	0.0	13.3	17.0
Youngstown CSA	550	68,807	6.2	15,529	22.4	14.4	9.9	17.1	32.0	22.3	21.6	24.7	22.6	38.9	26.0	31.6	0.0	2.9	13.7
Non-MSA OH	176	23,304	2.0	3,108	21.4	17.6	9.8	19.0	27.3	23.3	22.2	23.9	24.9	37.4	26.7	27.7	0.0	4.5	14.4
Total	8,814	1,985,060	100.0	264,666	21.4	13.5	9.5	17.4	25.7	21.1	20.7	21.4	22.0	40.6	30.1	33.0	0.0	9.2	14.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Columbus CSA	16,707	495,635	38.0	48,529	9.1	6.2	8.3	18.1	12.5	16.2	31.9	28.8	30.3	40.4	52.2	44.9	0.5	0.2	0.3		
Limited-Scope:																					
Cleveland CSA	18,148	555,836	41.3	77,751	8.3	5.3	7.9	15.4	11.8	15.2	38.2	35.8	36.8	37.2	46.6	39.4	0.9	0.4	0.7		
Dayton MSA	3,780	120,538	8.6	17,609	6.4	5.7	5.6	18.3	13.4	17.5	42.4	39.2	41.8	32.8	41.6	35.0	0.0	0.0	0.0		
Lima CSA	763	22,676	1.7	2,632	2.6	2.9	2.1	13.6	11.5	10.1	40.8	42.3	37.8	43.0	43.3	50.0	0.0	0.0	0.0		
Mansfield CSA	641	14,960	1.5	2,688	6.6	7.0	5.7	15.5	13.1	14.0	55.4	60.1	59.6	22.5	19.8	20.8	0.0	0.0	0.0		
Toledo CSA	1,259	17,803	2.9	10,793	12.0	7.3	10.2	11.8	10.7	11.6	36.8	32.0	36.0	39.3	49.9	42.1	0.1	0.1	0.0		
Weirton MSA	104	1,866	0.2	908	2.4	6.7	1.8	18.0	22.1	16.7	64.0	51.9	68.3	15.6	19.2	13.2	0.0	0.0	0.0		
Youngstown CSA	2,028	55,335	4.6	9,829	7.3	5.1	6.7	11.9	9.3	10.0	46.4	47.2	46.8	34.5	38.4	36.5	0.0	0.0	0.0		
Non-MSA OH	554	12,057	1.3	2,308	0.7	0.0	0.1	23.8	23.5	22.5	57.6	56.3	61.7	13.3	15.9	12.7	4.6	4.3	3.0		
Total	43,984	1,296,706	100.0	173,047	8.2	5.7	7.6	16.2	12.3	15.2	38.1	34.6	36.9	36.9	47.1	39.9	0.6	0.3	0.4		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Columbus CSA	25,122	355,874	37.9	47,952	7.9	5.4	6.9	16.9	10.9	15.7	35.0	30.6	34.1	39.0	52.4	42.6	1.1	0.6	0.8		
Limited-Scope:																					
Cleveland CSA	27,049	431,531	40.8	71,572	10.3	4.5	6.6	15.2	10.5	13.9	32.5	34.0	35.9	40.1	50.3	42.4	1.9	0.7	1.1		
Dayton MSA	5,620	79,126	8.5	16,929	7.9	4.7	6.3	17.0	11.5	15.2	36.3	34.9	37.4	38.4	48.4	40.9	0.4	0.4	0.2		
Lima CSA	1,037	16,545	1.6	2,569	3.9	2.3	3.1	14.3	10.5	10.0	41.4	44.2	42.0	40.3	43.0	44.9	0.0	0.0	0.0		
Mansfield CSA	956	13,786	1.4	2,706	3.5	2.9	3.0	18.0	12.4	15.0	57.5	58.0	60.6	20.2	25.1	20.2	0.8	1.6	1.1		
Toledo CSA	2,558	33,394	3.9	9,557	8.0	3.6	5.7	17.3	14.2	14.7	30.6	29.3	33.2	35.6	50.2	41.4	8.6	2.7	5.1		
Weirton MSA	206	2,359	0.3	932	9.2	17.0	9.1	8.1	8.7	7.5	71.6	64.1	68.9	11.1	10.2	14.5	0.0	0.0	0.0		
Youngstown CSA	2,830	41,123	4.3	9,599	5.6	3.8	3.9	16.6	11.1	12.4	49.1	51.7	56.4	28.4	33.0	26.8	0.4	0.4	0.5		
Non-MSA OH	932	11,242	1.4	2,326	1.7	2.1	1.5	20.1	20.1	19.4	62.0	56.8	65.3	12.4	19.9	12.6	3.9	1.2	1.2		
Total	66,310	984,980	100.0	164,142	8.6	4.8	6.3	16.2	11.1	14.5	35.4	34.3	37.7	37.9	49.2	40.4	1.8	0.7	1.1		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Columbus CSA	16,707	495,635	38.0	48,529	83.6	60.4	46.0	4.9	15.5	11.5	24.1
Limited-Scope:											
Cleveland CSA	18,148	555,836	41.3	77,751	83.3	58.0	49.0	6.0	17.8	10.7	24.2
Dayton MSA	3,780	120,538	8.6	17,609	81.1	57.1	48.5	5.9	16.4	13.0	26.5
Lima CSA	763	22,676	1.7	2,632	77.0	54.8	47.2	7.2	20.2	15.8	25.0
Mansfield CSA	641	14,960	1.5	2,688	79.5	58.0	47.2	5.8	18.6	14.7	23.4
Toledo CSA	1,259	17,803	2.9	10,793	80.0	63.1	47.3	6.5	18.3	13.4	18.6
Weirton MSA	104	1,866	0.2	908	79.1	61.5	57.3	4.9	16.3	16.0	22.1
Youngstown CSA	2,028	55,335	4.6	9,829	81.0	55.7	47.9	6.0	19.6	13.0	24.8
Non-MSA OH	554	12,057	1.3	2,308	78.3	60.7	45.5	5.6	17.5	16.1	21.8
Total	43,984	1,296,706	100.0	173,047	82.5	58.8	47.9	5.7	16.9	11.8	24.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Columbus CSA	25,122	355,874	37.9	47,952	91.9	73.1	53.1	2.1	15.0	5.9	11.9
Limited-Scope:											
Cleveland CSA	27,049	431,531	40.8	71,572	91.3	69.9	50.4	2.9	17.1	5.8	13.0
Dayton MSA	5,620	79,126	8.5	16,929	89.2	71.4	55.3	3.1	15.8	7.7	12.8
Lima CSA	1,037	16,545	1.6	2,569	86.0	63.3	50.1	4.2	20.3	9.8	16.5
Mansfield CSA	956	13,786	1.4	2,706	87.6	65.9	56.1	3.3	20.1	9.1	14.0
Toledo CSA	2,558	33,394	3.9	9,557	89.2	69.5	51.3	3.2	18.3	7.6	12.2
Weirton MSA	206	2,359	0.3	932	85.6	72.3	61.5	3.2	16.5	11.2	11.2
Youngstown CSA	2,830	41,123	4.3	9,599	89.0	68.7	52.4	3.2	18.2	7.8	13.1
Non-MSA OH	932	11,242	1.4	2,326	86.1	73.4	58.7	3.4	14.8	10.5	11.8
Total	66,310	984,980	100.0	164,142	90.8	71.1	52.1	2.7	16.3	6.4	12.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Columbus CSA	222	3,395	31.4	711	4.6	0.5	1.7	14.7	9.9	9.3	47.4	55.0	62.9	33.2	34.7	26.0	0.1	0.0	0.1	
Limited-Scope:																				
Cleveland CSA	215	2,875	30.4	836	3.3	0.9	0.6	9.8	5.6	4.3	50.2	58.1	62.0	36.5	35.3	33.1	0.1	0.0	0.0	
Dayton MSA	81	988	11.4	829	2.3	1.2	0.1	10.4	11.1	3.5	51.7	49.4	57.7	35.7	38.3	38.7	0.0	0.0	0.0	
Lima CSA	36	390	5.1	412	0.2	0.0	0.0	2.7	0.0	0.0	37.6	44.4	39.6	59.5	55.6	60.4	0.0	0.0	0.0	
Mansfield CSA	26	187	3.7	156	0.8	0.0	0.0	6.5	0.0	1.3	71.8	88.5	84.0	20.9	11.5	14.7	0.0	0.0	0.0	
Toledo CSA	41	448	5.8	349	3.8	0.0	0.6	7.4	4.9	1.1	45.7	46.3	58.7	43.1	48.8	39.3	0.0	0.0	0.3	
Weirton MSA	2	6	0.3	24	1.6	0.0	0.0	4.1	0.0	0.0	86.2	100.0	87.5	8.1	0.0	12.5	0.0	0.0	0.0	
Youngstown CSA	53	503	7.5	233	2.1	0.0	0.9	5.9	1.9	0.0	59.1	47.2	69.5	32.9	50.9	29.6	0.0	0.0	0.0	
Non-MSA OH	32	302	4.5	158	0.0	0.0	0.0	8.6	6.3	4.4	69.8	75.0	83.5	21.3	18.8	12.0	0.3	0.0	0.0	
Total	708	9,094	100.0	3,708	3.1	0.6	0.6	10.2	6.8	3.9	50.8	55.9	60.9	35.8	36.7	34.6	0.1	0.0	0.1	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Columbus CSA	403	4,992	32.3	678	4.3	1.2	0.9	17.4	17.6	15.6	43.3	46.4	54.9	34.6	34.5	28.3	0.4	0.2	0.3	
Limited-Scope:																				
Cleveland CSA	334	3,615	26.8	812	7.5	2.4	1.1	12.2	8.1	5.4	43.5	50.6	64.0	36.4	38.3	29.3	0.5	0.6	0.1	
Dayton MSA	156	1,506	12.5	551	4.0	3.2	0.9	11.2	3.8	2.7	46.6	48.1	53.9	38.1	44.9	42.5	0.1	0.0	0.0	
Lima CSA	95	1,079	7.6	262	1.1	0.0	0.0	2.3	0.0	0.8	41.5	41.1	46.9	55.0	58.9	52.3	0.0	0.0	0.0	
Mansfield CSA	38	417	3.0	143	2.4	2.6	0.7	6.1	0.0	0.7	73.8	63.2	78.3	17.7	34.2	20.3	0.0	0.0	0.0	
Toledo CSA	85	823	6.8	286	4.3	0.0	1.4	12.5	2.4	1.7	39.6	45.9	59.8	39.5	51.8	37.1	4.1	0.0	0.0	
Weirton MSA	1	4	0.1	26	0.5	0.0	0.0	4.1	0.0	0.0	89.3	100.0	100.0	6.1	0.0	0.0	0.0	0.0	0.0	
Youngstown CSA	81	771	6.5	257	2.2	1.2	0.0	11.6	4.9	4.7	66.4	72.8	79.4	19.7	21.0	16.0	0.1	0.0	0.0	
Non-MSA OH	54	568	4.3	130	0.1	0.0	0.0	19.4	31.5	33.8	71.3	66.7	64.6	8.3	1.9	1.5	0.9	0.0	0.0	
Total	1,247	13,775	100.0	3,145	5.0	1.6	0.8	13.0	10.2	7.3	46.8	50.4	60.7	34.7	37.5	31.1	0.6	0.2	0.1	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Columbus CSA	222	3,395	31.4	711	96.1	60.8	48.0	2.2	10.4	1.7	28.8
Limited-Scope:											
Cleveland CSA	215	2,875	30.4	836	96.4	66.0	66.5	2.2	14.0	1.4	20.0
Dayton MSA	81	988	11.4	829	96.4	63.0	50.9	2.1	11.1	1.5	25.9
Lima CSA	36	390	5.1	412	97.7	69.4	48.3	1.2	2.8	1.0	27.8
Mansfield CSA	26	187	3.7	156	98.0	61.5	57.1	1.3	19.2	0.8	19.2
Toledo CSA	41	448	5.8	349	95.7	63.4	60.7	2.7	12.2	1.6	24.4
Weirton MSA	2	6	0.3	24	98.4	50.0	50.0	0.8	0.0	0.8	50.0
Youngstown CSA	53	503	7.5	233	97.9	54.7	57.5	1.3	11.3	0.8	34.0
Non-MSA OH	32	302	4.5	158	98.1	78.1	45.6	0.9	6.3	0.9	15.6
Total	708	9,094	100.0	3,708	96.5	63.6	54.9	2.0	11.4	1.4	25.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Columbus CSA	403	4,992	32.3	678	97.5	68.2	49.7	1.3	12.9	1.2	18.9
Limited-Scope:											
Cleveland CSA	334	3,615	26.8	812	97.7	76.0	69.8	1.2	9.6	1.1	14.4
Dayton MSA	156	1,506	12.5	551	97.6	70.5	63.0	1.1	9.0	1.2	20.5
Lima CSA	95	1,079	7.6	262	98.2	78.9	64.5	0.9	3.2	0.9	17.9
Mansfield CSA	38	417	3.0	143	98.2	63.2	65.0	0.9	18.4	0.9	18.4
Toledo CSA	85	823	6.8	286	97.4	69.4	65.7	1.4	9.4	1.2	21.2
Weirton MSA	1	4	0.1	26	99.0	0.0	53.8	0.5	0.0	0.5	100.0
Youngstown CSA	81	771	6.5	257	98.7	67.9	57.6	0.6	6.2	0.6	25.9
Non-MSA OH	54	568	4.3	130	98.5	79.6	49.2	0.7	7.4	0.8	13.0
Total	1,247	13,775	100.0	3,145	97.7	71.8	61.3	1.2	10.0	1.1	18.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Oklahoma City MSA	1,590	329,235	65.4	61,060	3.9	1.1	2.0	19.3	13.0	13.0	40.4	30.8	36.4	36.4	55.0	48.4	0.1	0.1	0.1
Limited-Scope:																			
Tulsa MSA	733	166,642	30.1	28,586	4.5	0.4	1.3	20.5	11.2	12.7	32.9	32.2	33.7	42.1	56.2	52.3	0.0	0.0	0.0
Non-MSA OK	109	22,689	4.5	2,547	0.6	0.0	1.2	22.0	19.3	21.7	43.1	24.8	30.7	34.3	56.0	46.4	0.0	0.0	0.0
Total	2,432	518,566	100.0	92,193	4.0	0.8	1.8	19.8	12.7	13.2	37.9	31.0	35.4	38.2	55.4	49.6	0.0	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Oklahoma City MSA	880	199,115	62.5	40,208	3.9	3.6	2.8	19.0	17.6	16.4	37.5	33.8	35.9	38.5	44.1	44.1	1.0	0.9	0.8
Limited-Scope:																			
Tulsa MSA	488	111,411	34.6	18,895	3.6	2.5	1.9	23.2	27.0	18.6	27.7	29.1	28.0	45.4	41.4	51.5	0.1	0.0	0.0
Non-MSA OK	41	7,366	2.9	1,735	0.1	2.4	0.9	17.8	9.8	14.1	35.8	51.2	38.4	45.6	36.6	45.0	0.8	0.0	1.6
Total	1,409	317,892	100.0	60,838	3.7	3.2	2.5	20.4	20.7	17.0	34.2	32.6	33.5	41.1	42.9	46.4	0.7	0.6	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Oklahoma City MSA	1,590	329,235	65.4	61,060	21.5	9.3	4.7	17.3	21.6	14.2	20.3	20.1	17.3	40.9	44.4	32.7	0.0	4.6	31.2
Limited-Scope:																			
Tulsa MSA	733	166,642	30.1	28,586	22.0	7.8	5.6	16.9	25.0	15.6	19.6	17.6	17.5	41.4	45.2	34.9	0.0	4.5	26.5
Non-MSA OK	109	22,689	4.5	2,547	19.9	4.6	1.6	17.6	6.4	8.4	18.8	11.9	12.7	43.8	73.4	47.7	0.0	3.7	29.5
Total	2,432	518,566	100.0	92,193	21.6	8.6	4.9	17.2	22.0	14.4	20.0	19.0	17.2	41.2	45.9	33.8	0.0	4.5	29.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Full-Scope:																					
Oklahoma City MSA	880	199,115	62.5	40,208	21.3	12.0	6.7	17.7	25.0	16.3	20.4	23.0	18.3	40.7	36.1	30.5	0.0	3.9	28.3		
Limited-Scope:																					
Tulsa MSA	488	111,411	34.6	18,895	21.5	11.5	6.8	17.3	28.1	17.0	18.9	23.8	18.5	42.4	33.4	34.1	0.0	3.3	23.6		
Non-MSA OK	41	7,366	2.9	1,735	17.8	2.4	2.1	17.3	17.1	9.2	16.6	17.1	16.0	48.3	53.7	43.9	0.0	9.8	28.8		
Total	1,409	317,892	100.0	60,838	21.2	11.6	6.6	17.6	25.8	16.3	19.7	23.1	18.3	41.5	35.7	32.0	0.0	3.8	26.9		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate		
Full-Scope:																					
Oklahoma City MSA	7,088	110,297	66.8	30,732	4.7	4.0	4.7	21.5	16.3	20.0	34.2	32.0	34.3	36.5	45.7	38.6	3.0	2.1	2.4		
Limited-Scope:																					
Tulsa MSA	3,306	46,255	31.2	16,005	4.1	2.9	3.7	21.1	15.2	21.5	33.9	33.7	34.2	40.9	48.3	40.7	0.0	0.0	0.0		
Non-MSA OK	214	2,087	2.0	1,935	9.9	5.1	7.6	27.8	20.6	25.4	32.4	36.0	32.1	29.9	38.3	34.8	0.0	0.0	0.0		
Total	10,608	158,639	100.0	48,672	4.6	3.7	4.5	21.6	16.0	20.7	34.0	32.6	34.2	37.9	46.3	39.1	1.8	1.4	1.5		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Oklahoma City MSA	11,994	158,571	65.9	28,763	4.9	3.0	4.2	21.6	15.3	20.2	32.6	29.1	31.4	38.6	51.2	42.3	2.3	1.3	1.9		
Limited-Scope:																					
Tulsa MSA	5,826	71,392	32.0	15,690	4.1	2.8	4.0	24.3	15.8	23.5	28.6	25.5	27.8	42.8	55.6	44.5	0.1	0.2	0.1		
Non-MSA OK	386	4,238	2.1	1,607	6.0	3.6	4.9	24.3	21.0	22.3	31.5	34.2	32.1	35.9	39.4	39.0	2.3	1.8	1.7		
Total	18,206	234,201	100.0	46,060	4.7	3.0	4.2	22.6	15.6	21.4	31.2	28.1	30.2	40.0	52.4	43.0	1.6	0.9	1.3		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Oklahoma City MSA	7,088	110,297	66.8	30,732	90.2	63.5	40.8	2.9	15.9	6.8	20.6
Limited-Scope:											
Tulsa MSA	3,306	46,255	31.2	16,005	88.9	62.9	41.4	3.9	20.1	7.2	16.9
Non-MSA OK	214	2,087	2.0	1,935	85.4	65.9	49.5	3.3	17.3	11.2	16.8
Total	10,608	158,639	100.0	48,672	89.6	63.4	41.3	3.3	17.2	7.1	19.4
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Oklahoma City MSA	11,994	158,571	65.9	28,763	92.4	71.0	52.3	2.2	16.8	5.5	12.2
Limited-Scope:											
Tulsa MSA	5,826	71,392	32.0	15,690	91.1	67.0	51.1	2.9	20.5	6.0	12.5
Non-MSA OK	386	4,238	2.1	1,607	87.9	70.7	61.2	2.8	18.1	9.3	11.1
Total	18,206	234,201	100.0	46,060	91.8	69.7	52.2	2.4	18.0	5.8	12.3
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Oklahoma City MSA	88	1,056	63.8	439	3.8	0.0	0.7	17.5	4.5	5.5	37.9	40.9	60.1	39.7	54.5	33.5	1.1	0.0	0.2	
Limited-Scope:																				
Tulsa MSA	35	372	25.4	103	4.1	0.0	0.0	19.3	5.7	8.7	36.2	54.3	35.0	40.3	40.0	56.3	0.0	0.0	0.0	
Non-MSA OK	15	136	10.9	143	3.3	0.0	0.0	12.4	6.7	1.4	51.4	93.3	63.6	33.0	0.0	35.0	0.0	0.0	0.0	
Total	138	1,564	100.0	685	3.9	0.0	0.4	17.8	5.1	5.1	38.1	50.0	57.1	39.5	44.9	37.2	0.7	0.0	0.1	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Oklahoma City MSA	186	1,949	74.4	429	3.7	0.0	0.7	20.8	11.3	15.4	32.0	31.2	26.1	42.3	57.0	57.1	1.1	0.5	0.7		
Limited-Scope:																					
Tulsa MSA	54	568	21.6	127	3.7	0.0	0.0	22.1	13.0	16.5	35.0	22.2	31.5	39.0	64.8	52.0	0.2	0.0	0.0		
Non-MSA OK	10	78	4.0	148	2.2	0.0	0.0	17.0	10.0	13.5	26.1	60.0	14.9	54.1	30.0	71.6	0.7	0.0	0.0		
Total	250	2,595	100.0	704	3.6	0.0	0.4	21.0	11.6	15.2	32.7	30.4	24.7	41.9	57.6	59.2	0.8	0.4	0.4		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Oklahoma City MSA	88	1,056	63.8	439	97.7	69.3	67.7	1.2	6.8	1.1	23.9
Limited-Scope:											
Tulsa MSA	35	372	25.4	103	97.0	77.1	59.2	1.2	11.4	1.8	11.4
Non-MSA OK	15	136	10.9	143	98.4	60.0	83.9	0.8	6.7	0.8	33.3
Total	138	1,564	100.0	685	97.5	70.3	69.8	1.2	8.0	1.3	21.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Oklahoma City MSA	186	1,949	74.4	429	98.4	80.6	74.8	0.7	4.8	0.9	14.5
Limited-Scope:											
Tulsa MSA	54	568	21.6	127	97.6	66.7	66.1	0.8	16.7	1.6	16.7
Non-MSA OK	10	78	4.0	148	98.3	40.0	82.4	0.7	0.0	1.1	60.0
Total	250	2,595	100.0	704	98.2	76.0	74.9	0.7	7.2	1.1	16.8
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Medford CSA	674	177,351	26.7	18,991	0.1	0.1	0.1	10.6	12.2	12.2	61.2	55.6	57.3	28.1	32.0	30.3	0.0	0.0	0.0
Limited-Scope:																			
Bend CSA	912	399,135	36.1	22,137	0.0	0.0	0.0	16.7	17.5	16.7	64.3	58.9	63.9	19.0	23.6	19.4	0.0	0.0	0.0
Eugene MSA	539	217,035	21.3	22,202	0.9	3.7	1.1	16.9	19.9	17.1	57.2	47.5	57.7	25.0	28.9	24.1	0.0	0.0	0.0
Non-MSA OR	402	108,620	15.9	17,746	0.6	0.2	0.5	9.4	7.0	8.7	78.9	75.6	76.3	11.2	17.2	14.5	0.0	0.0	0.0
Total	2,527	902,141	100.0	81,076	0.4	0.9	0.5	13.0	14.9	14.0	65.9	58.3	63.4	20.6	26.0	22.2	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Medford CSA	221	73,422	27.3	10,062	0.1	0.0	0.2	17.7	19.5	18.0	56.7	49.8	57.3	24.5	29.4	23.7	0.9	1.4	0.8
Limited-Scope:																			
Bend CSA	255	148,323	31.4	11,283	1.1	0.4	1.0	12.7	12.2	14.2	54.9	45.9	56.5	31.3	41.6	28.3	0.0	0.0	0.0
Eugene MSA	176	73,648	21.7	11,586	0.0	0.0	0.0	18.8	19.9	19.3	53.8	52.3	52.5	26.9	24.4	27.3	0.5	3.4	0.9
Non-MSA OR	159	43,067	19.6	10,402	0.6	0.0	0.4	18.5	18.2	18.8	66.3	65.4	66.9	14.6	16.4	13.9	0.0	0.0	0.0
Total	811	338,460	100.0	43,333	0.4	0.1	0.4	17.3	17.0	17.6	58.4	52.2	58.1	23.5	29.6	23.5	0.4	1.1	0.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Medford CSA	674	177,351	26.7	18,991	20.6	5.8	4.4	18.5	19.9	15.2	19.6	25.7	23.4	41.2	45.5	40.5	0.0	3.1	16.5
Limited-Scope:																			
Bend CSA	912	399,135	36.1	22,137	21.5	2.7	4.1	18.9	14.6	13.2	20.0	16.0	21.3	39.6	62.5	47.2	0.0	4.2	14.2
Eugene MSA	539	217,035	21.3	22,202	21.4	5.9	4.2	17.8	16.9	15.0	20.5	19.9	24.3	40.3	48.6	42.8	0.0	8.7	13.7
Non-MSA OR	402	108,620	15.9	17,746	21.7	6.7	4.8	19.0	15.9	16.2	20.6	17.2	22.4	38.8	55.0	38.5	0.0	5.2	18.2
Total	2,527	902,141	100.0	81,076	21.3	4.9	4.3	18.5	16.7	14.8	20.2	19.6	22.8	40.0	53.8	42.5	0.0	5.0	15.5
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Medford CSA	221	73,422	27.3	10,062	20.1	8.1	4.8	19.0	19.9	14.2	20.8	22.6	23.5	40.2	45.2	43.6	0.0	4.1	13.9
Limited-Scope:																			
Bend CSA	255	148,323	31.4	11,283	19.6	4.7	5.6	18.0	11.0	13.4	22.1	13.7	21.1	40.4	62.4	48.6	0.0	8.2	11.3
Eugene MSA	176	73,648	21.7	11,586	21.4	8.0	5.5	16.9	19.9	17.2	21.4	19.9	25.2	40.3	40.9	41.8	0.0	11.4	10.2
Non-MSA OR	159	43,067	19.6	10,402	21.5	7.5	6.4	19.5	25.2	17.3	21.6	18.9	23.6	37.4	44.0	39.9	0.0	4.4	12.8
Total	811	338,460	100.0	43,333	20.8	6.9	5.6	18.4	18.1	15.5	21.4	18.5	23.4	39.4	49.4	43.5	0.0	7.0	12.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate		
Full-Scope:																					
Medford CSA	1,658	40,247	28.8	7,007	3.9	2.7	4.0	15.9	15.4	15.1	56.5	53.0	56.0	23.7	29.0	24.8	0.0	0.0	0.0		
Limited-Scope:																					
Bend CSA	1,878	38,611	32.6	7,853	0.0	0.0	0.0	27.1	25.3	26.5	49.4	44.0	48.0	23.5	30.7	25.5	0.0	0.0	0.0		
Eugene MSA	1,521	34,142	26.4	7,209	5.1	5.1	5.3	23.0	23.1	25.1	48.6	45.2	47.6	23.3	26.5	22.0	0.0	0.0	0.0		
Non-MSA OR	701	9,336	12.2	6,305	1.0	1.7	0.9	13.6	14.1	13.2	72.5	70.0	74.5	12.9	14.1	11.4	0.0	0.0	0.0		
Total	5,758	122,336	100.0	28,374	2.6	2.3	2.6	19.9	20.5	20.4	56.4	50.1	55.8	21.0	27.1	21.3	0.0	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Medford CSA	2,416	35,265	26.3	6,526	4.1	2.6	3.5	17.1	15.9	16.0	54.8	53.1	56.1	23.4	28.1	23.8	0.7	0.2	0.5		
Limited-Scope:																					
Bend CSA	3,049	42,110	33.2	7,727	1.2	0.4	0.8	14.3	15.8	14.5	51.7	50.6	53.7	32.7	33.2	31.0	0.0	0.0	0.0		
Eugene MSA	2,421	29,812	26.4	6,821	0.0	0.0	0.0	26.9	24.2	27.4	45.9	44.1	47.0	24.8	30.2	23.6	2.5	1.6	2.1		
Non-MSA OR	1,286	16,253	14.0	6,103	0.4	0.4	0.4	21.9	19.9	22.1	63.6	60.8	64.5	14.1	18.9	13.0	0.0	0.0	0.0		
Total	9,172	123,440	100.0	27,177	1.5	0.9	1.2	20.1	18.6	19.8	53.7	51.0	55.0	23.9	29.1	23.4	0.8	0.5	0.6		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Medford CSA	1,658	40,247	28.8	7,007	91.0	60.6	50.0	2.8	18.6	6.2	20.7
Limited-Scope:											
Bend CSA	1,878	38,611	32.6	7,853	92.2	64.1	53.1	2.5	13.4	5.3	22.6
Eugene MSA	1,521	34,142	26.4	7,209	89.3	63.6	52.8	3.5	17.9	7.3	18.5
Non-MSA OR	701	9,336	12.2	6,305	88.1	66.2	53.7	3.0	15.5	8.9	18.3
Total	5,758	122,336	100.0	28,374	90.1	63.2	52.4	2.9	16.4	6.9	20.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Medford CSA	2,416	35,265	26.3	6,526	92.8	70.9	56.1	2.1	17.3	5.1	11.8
Limited-Scope:											
Bend CSA	3,049	42,110	33.2	7,727	94.0	73.6	55.1	1.8	14.4	4.2	12.0
Eugene MSA	2,421	29,812	26.4	6,821	91.5	71.1	54.6	2.6	17.1	5.9	11.8
Non-MSA OR	1,286	16,253	14.0	6,103	90.6	73.0	59.8	2.3	16.3	7.2	10.7
Total	9,172	123,440	100.0	27,177	92.2	72.1	56.3	2.2	16.1	5.6	11.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Medford CSA	103	1,984	41.5	229	1.2	0.0	2.6	9.1	7.8	7.0	66.5	76.7	65.9	23.3	15.5	24.5	0.0	0.0	0.0
Limited-Scope:																			
Bend CSA	40	624	16.1	181	0.0	0.0	0.0	15.4	12.5	9.4	69.6	70.0	80.1	15.0	17.5	10.5	0.0	0.0	0.0
Eugene MSA	51	830	20.6	176	1.2	0.0	1.1	15.6	15.7	13.1	53.7	51.0	56.8	29.5	33.3	29.0	0.0	0.0	0.0
Non-MSA OR	54	708	21.8	627	0.2	0.0	0.0	6.6	5.6	3.5	84.6	87.0	92.3	8.6	7.4	4.1	0.0	0.0	0.0
Total	248	4,146	100.0	1,213	0.7	0.0	0.7	10.9	9.7	6.4	70.0	72.6	80.4	18.4	17.7	12.5	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Medford CSA	146	1,504	35.0	204	1.3	0.7	1.0	11.8	6.8	7.8	60.2	72.6	63.7	24.7	19.2	25.0	2.0	0.7	2.5	
Limited-Scope:																				
Bend CSA	65	662	15.6	162	0.6	0.0	0.6	9.2	10.8	8.6	52.8	44.6	51.9	37.5	44.6	38.9	0.0	0.0	0.0	
Eugene MSA	93	1,059	22.3	152	0.0	0.0	0.0	18.8	10.8	8.6	58.5	64.5	74.3	22.0	23.7	17.1	0.7	1.1	0.0	
Non-MSA OR	113	1,240	27.1	528	1.7	0.9	0.9	20.0	18.6	12.5	59.1	54.0	58.0	19.3	26.5	28.6	0.0	0.0	0.0	
Total	417	4,465	100.0	1,046	1.0	0.5	0.8	15.3	11.5	10.4	58.1	61.4	60.5	25.0	26.1	27.8	0.7	0.5	0.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Medford CSA	103	1,984	41.5	229	97.6	58.3	60.7	1.3	19.4	1.1	22.3
Limited-Scope:											
Bend CSA	40	624	16.1	181	98.7	80.0	66.9	1.0	10.0	0.3	10.0
Eugene MSA	51	830	20.6	176	97.1	66.7	62.5	1.7	15.7	1.2	17.6
Non-MSA OR	54	708	21.8	627	96.9	61.1	64.6	1.8	18.5	1.3	20.4
Total	248	4,146	100.0	1,213	97.5	64.1	63.9	1.5	16.9	1.0	19.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Medford CSA	146	1,504	35.0	204	98.4	67.1	65.7	0.9	19.2	0.8	13.7
Limited-Scope:											
Bend CSA	65	662	15.6	162	98.8	70.8	62.3	0.7	10.8	0.4	18.5
Eugene MSA	93	1,059	22.3	152	98.1	62.4	65.1	1.1	22.6	0.9	15.1
Non-MSA OR	113	1,240	27.1	528	97.4	77.0	67.4	1.6	13.3	1.0	9.7
Total	417	4,465	100.0	1,046	98.1	69.3	66.0	1.1	17.0	0.8	13.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	2,123	518,846	88.9	97,171	2.9	1.7	1.5	14.0	7.5	10.4	50.3	37.8	45.3	32.7	53.0	42.8	0.0	0.0	0.0	
Limited-Scope:																				
Scranton MSA	264	46,532	11.1	18,458	1.7	1.1	1.6	15.1	17.0	14.3	55.0	43.2	50.3	28.2	38.6	33.7	0.0	0.0	0.1	
Total	2,387	565,378	100.0	115,629	2.7	1.7	1.5	14.2	8.5	11.0	51.2	38.4	46.1	31.8	51.4	41.4	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Pittsburgh MSA	1,089	264,723	85.1	63,431	2.8	2.9	2.2	15.8	14.2	13.2	45.8	42.1	42.7	35.4	40.4	41.7	0.2	0.3	0.1
Limited-Scope:																			
Scranton MSA	190	34,113	14.9	13,689	1.4	1.1	1.5	19.1	24.7	20.9	49.3	48.9	45.3	30.1	24.2	32.1	0.2	1.1	0.1
Total	1,279	298,836	100.0	77,120	2.5	2.7	2.1	16.5	15.8	14.6	46.5	43.2	43.2	34.3	38.0	40.0	0.2	0.4	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Pittsburgh MSA	2,123	518,846	88.9	97,171	20.2	6.1	8.2	16.9	20.2	17.2	20.3	20.2	20.9	42.6	49.0	38.6	0.0	4.5	15.0
Limited-Scope:																			
Scranton MSA	264	46,532	11.1	18,458	21.5	9.5	8.2	17.5	14.4	18.2	20.5	20.5	20.3	40.5	49.6	34.3	0.0	6.1	19.0
Total	2,387	565,378	100.0	115,629	20.4	6.5	8.2	17.0	19.5	17.4	20.3	20.2	20.8	42.2	49.1	37.9	0.0	4.7	15.7
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	1,089	264,723	85.1	63,431	19.1	13.6	11.6	17.5	25.3	19.9	20.9	20.5	20.9	42.5	35.7	34.1	0.0	5.0	13.5	
Limited-Scope:																				
Scranton MSA	190	34,113	14.9	13,689	21.8	11.1	9.1	17.2	20.5	19.7	20.4	24.2	21.2	40.5	38.9	33.7	0.0	5.3	16.2	
Total	1,279	298,836	100.0	77,120	19.6	13.2	11.2	17.5	24.6	19.9	20.8	21.0	20.9	42.1	36.2	34.0	0.0	5.0	14.0	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	5,596	66,432	85.4	50,464	5.3	3.0	4.0	13.5	11.3	11.8	40.3	39.3	38.9	40.1	45.9	36.6	1.0	0.5	8.7	
Limited-Scope:																				
Scranton MSA	960	11,548	14.6	11,078	2.9	0.9	2.4	20.2	16.4	18.0	50.0	47.6	51.3	24.8	33.4	26.7	2.1	1.7	1.6	
Total	6,556	77,980	100.0	61,542	4.8	2.7	3.7	14.7	12.0	12.9	42.1	40.5	41.1	37.1	44.1	34.9	1.2	0.7	7.4	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Pittsburgh MSA	11,966	139,374	85.5	41,227	5.7	3.4	4.2	13.9	10.2	13.1	37.4	33.7	39.3	41.0	51.5	39.5	1.9	1.1	3.9	
Limited-Scope:																				
Scranton MSA	2,029	26,627	14.5	9,835	5.0	2.9	4.1	25.5	19.0	23.1	40.5	39.3	41.8	28.6	38.5	30.6	0.4	0.3	0.4	
Total	13,995	166,001	100.0	51,062	5.6	3.3	4.2	16.2	11.5	15.0	38.0	34.5	39.8	38.6	49.7	37.8	1.6	1.0	3.3	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Pittsburgh MSA	5,596	66,432	85.4	50,464	86.2	68.3	47.8	4.4	18.3	9.4	13.4
Limited-Scope:											
Scranton MSA	960	11,548	14.6	11,078	86.4	65.3	40.3	4.0	19.0	9.6	15.7
Total	6,556	77,980	100.0	61,542	86.2	67.9	46.5	4.4	18.4	9.4	13.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Pittsburgh MSA	11,966	139,374	85.5	41,227	88.3	72.5	49.4	3.6	15.6	8.2	12.0
Limited-Scope:											
Scranton MSA	2,029	26,627	14.5	9,835	88.8	69.6	50.7	3.2	17.9	8.0	12.5
Total	13,995	166,001	100.0	51,062	88.4	72.1	49.7	3.5	15.9	8.1	12.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Pittsburgh MSA	42	396	87.5	192	2.4	0.0	2.1	10.6	4.8	7.8	55.4	59.5	66.1	31.5	35.7	24.0	0.1	0.0	0.0
Limited-Scope:																			
Scranton MSA	6	83	12.5	41	2.0	0.0	0.0	11.7	0.0	4.9	49.7	83.3	58.5	36.3	16.7	34.1	0.3	0.0	2.4
Total	48	479	100.0	233	2.3	0.0	1.7	10.8	4.2	7.3	54.4	62.5	64.8	32.4	33.3	25.8	0.1	0.0	0.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Pittsburgh MSA	101	880	86.3	166	2.7	1.0	0.0	13.2	5.9	8.4	50.3	45.5	59.0	33.1	47.5	32.5	0.6	0.0	0.0
Limited-Scope:																			
Scranton MSA	16	124	13.7	36	1.6	0.0	0.0	15.6	12.5	8.3	50.0	56.3	66.7	32.7	31.3	25.0	0.0	0.0	0.0
Total	117	1,004	100.0	202	2.5	0.9	0.0	13.7	6.8	8.4	50.3	47.0	60.4	33.1	45.3	31.2	0.5	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Pittsburgh MSA	42	396	87.5	192	97.0	76.2	55.2	1.7	2.4	1.2	21.4
Limited-Scope:											
Scranton MSA	6	83	12.5	41	97.1	66.7	63.4	2.0	16.7	0.9	16.7
Total	48	479	100.0	233	97.1	75.0	56.7	1.8	4.2	1.2	20.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Pittsburgh MSA	101	880	86.3	166	97.5	75.2	62.7	1.3	9.9	1.2	14.9
Limited-Scope:											
Scranton MSA	16	124	13.7	36	97.5	87.5	75.0	1.6	0.0	1.0	12.5
Total	117	1,004	100.0	202	97.5	76.9	64.9	1.3	8.5	1.2	14.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Charleston MSA	1,248	655,214	57.5	64,640	3.3	1.8	2.3	19.1	5.5	11.1	42.4	32.2	45.0	34.9	60.2	41.2	0.3	0.3	0.4
Limited-Scope:																			
Greenville MSA	924	274,319	42.5	48,993	3.4	2.9	2.9	17.3	10.9	11.6	44.3	39.6	42.1	34.9	46.5	43.5	0.0	0.0	0.0
Total	2,172	929,533	100.0	113,633	3.4	2.3	2.5	18.2	7.8	11.3	43.4	35.4	43.7	34.9	54.4	42.2	0.1	0.2	0.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Charleston MSA	765	425,230	59.7	37,711	4.6	4.2	2.6	22.8	18.4	17.2	33.6	28.2	35.4	38.4	48.5	44.0	0.6	0.7	0.7
Limited-Scope:																			
Greenville MSA	517	157,964	40.3	30,457	3.1	1.5	2.9	16.5	16.1	14.8	43.6	32.3	41.6	36.4	48.9	39.7	0.4	1.2	1.0
Total	1,282	583,194	100.0	68,168	3.8	3.1	2.7	19.4	17.5	16.1	38.9	29.9	38.2	37.3	48.7	42.1	0.5	0.9	0.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Charleston MSA	1,248	655,214	57.5	64,640	22.6	3.4	5.2	16.7	12.6	16.5	19.9	15.1	19.7	40.8	59.9	37.6	0.0	9.1	21.1
Limited-Scope:																			
Greenville MSA	924	274,319	42.5	48,993	22.1	6.7	6.3	16.8	21.9	18.0	18.8	20.2	20.7	42.3	45.0	36.9	0.0	6.2	18.1
Total	2,172	929,533	100.0	113,633	22.3	4.8	5.7	16.8	16.5	17.1	19.3	17.3	20.1	41.6	53.5	37.3	0.0	7.8	19.8
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Charleston MSA	765	425,230	59.7	37,711	22.1	9.3	6.2	17.2	24.4	17.9	20.1	17.5	19.6	40.6	40.8	34.8	0.0	8.0	21.5	
Limited-Scope:																				
Greenville MSA	517	157,964	40.3	30,457	20.2	10.6	7.1	17.5	23.8	19.1	20.2	19.0	22.1	42.1	41.2	37.0	0.0	5.4	14.6	
Total	1,282	583,194	100.0	68,168	21.1	9.8	6.6	17.4	24.2	18.5	20.1	18.1	20.7	41.4	41.0	35.8	0.0	6.9	18.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Charleston MSA	2,335	26,937	57.2	25,339	7.6	6.4	7.0	18.6	10.7	16.0	34.6	31.2	34.0	37.6	49.6	41.3	1.5	2.2	1.7		
Limited-Scope:																					
Greenville MSA	1,748	23,208	42.8	21,330	6.3	5.1	5.6	15.9	10.4	13.8	39.7	36.2	39.1	38.1	48.3	41.5	0.0	0.0	0.0		
Total	4,083	50,145	100.0	46,669	7.0	5.9	6.4	17.3	10.6	15.0	37.1	33.3	36.3	37.9	49.0	41.4	0.8	1.2	0.9		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Charleston MSA	5,955	71,126	54.7	24,675	6.7	3.7	5.4	22.7	12.7	19.4	28.1	28.9	30.2	41.4	52.7	43.2	1.2	2.1	1.8	
Limited-Scope:																				
Greenville MSA	4,941	60,214	45.3	21,271	4.0	2.8	3.6	16.4	12.7	15.9	36.3	33.8	38.6	42.2	49.1	40.7	1.1	1.7	1.2	
Total	10,896	131,340	100.0	45,946	5.5	3.3	4.5	19.9	12.7	17.8	31.7	31.1	34.1	41.7	51.1	42.1	1.1	1.9	1.5	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charleston MSA	2,335	26,937	57.2	25,339	85.5	70.7	45.2	4.2	15.3	10.4	14.0
Limited-Scope:											
Greenville MSA	1,748	23,208	42.8	21,330	83.6	70.9	47.8	5.0	15.7	11.4	13.4
Total	4,083	50,145	100.0	46,669	84.6	70.8	46.4	4.6	15.5	10.9	13.7
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charleston MSA	5,955	71,126	54.7	24,675	93.2	75.3	49.8	1.6	13.4	5.2	11.4
Limited-Scope:											
Greenville MSA	4,941	60,214	45.3	21,271	91.6	73.7	52.0	2.2	14.3	6.2	12.0
Total	10,896	131,340	100.0	45,946	92.5	74.6	50.8	1.9	13.8	5.6	11.7
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Charleston MSA	21	207	40.4	90	3.4	0.0	1.1	18.8	14.3	15.6	44.9	47.6	46.7	32.4	38.1	36.7	0.5	0.0	0.0
Limited-Scope:																			
Greenville MSA	31	265	59.6	134	3.1	3.2	1.5	15.5	22.6	22.4	50.5	48.4	47.8	31.0	25.8	28.4	0.0	0.0	0.0
Total	52	472	100.0	224	3.2	1.9	1.3	17.1	19.2	19.6	47.7	48.1	47.3	31.7	30.8	31.7	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Charleston MSA	49	527	39.8	88	6.1	4.1	8.0	27.2	24.5	33.0	33.2	14.3	30.7	32.9	55.1	28.4	0.6	2.0	0.0	
Limited-Scope:																				
Greenville MSA	74	735	60.2	109	3.2	1.4	0.0	17.6	13.5	25.7	45.2	48.6	38.5	33.3	36.5	35.8	0.8	0.0	0.0	
Total	123	1,262	100.0	197	4.7	2.4	3.6	22.5	17.9	28.9	39.1	35.0	35.0	33.1	43.9	32.5	0.7	0.8	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charleston MSA	21	207	40.4	90	94.0	90.5	56.7	3.2	4.8	2.8	4.8
Limited-Scope:											
Greenville MSA	31	265	59.6	134	96.8	64.5	53.0	1.5	9.7	1.7	25.8
Total	52	472	100.0	224	95.4	75.0	54.5	2.3	7.7	2.2	17.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charleston MSA	49	527	39.8	88	96.7	81.6	63.6	1.4	2.0	1.8	16.3
Limited-Scope:											
Greenville MSA	74	735	60.2	109	97.8	75.7	60.6	0.7	5.4	1.6	18.9
Total	123	1,262	100.0	197	97.2	78.0	61.9	1.1	4.1	1.7	17.9
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	593	167,150	100.0	17,625	0.0	0.0	0.0	21.5	7.1	15.6	51.8	53.1	50.5	26.7	39.8	33.8	0.0	0.0	0.0
Total	593	167,150	100.0	17,625	0.0	0.0	0.0	21.5	7.1	15.6	51.8	53.1	50.5	26.7	39.8	33.8	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Full-Scope:																					
Sioux Falls MSA	308	78,474	100.0	10,865	1.1	2.3	1.0	18.2	26.9	16.4	56.1	52.9	58.3	24.6	17.9	24.3	0.0	0.0	0.0		
Total	308	78,474	100.0	10,865	1.1	2.3	1.0	18.2	26.9	16.4	56.1	52.9	58.3	24.6	17.9	24.3	0.0	0.0	0.0		
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	593	167,150	100.0	17,625	18.8	3.4	7.0	17.9	19.4	20.3	24.4	24.6	20.8	38.9	51.8	33.3	0.0	0.8	18.6
Total	593	167,150	100.0	17,625	18.8	3.4	7.0	17.9	19.4	20.3	24.4	24.6	20.8	38.9	51.8	33.3	0.0	0.8	18.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	308	78,474	100.0	10,865	18.5	13.0	7.0	17.9	30.8	20.0	24.6	19.5	23.2	39.0	35.4	34.9	0.0	1.3	15.0
Total	308	78,474	100.0	10,865	18.5	13.0	7.0	17.9	30.8	20.0	24.6	19.5	23.2	39.0	35.4	34.9	0.0	1.3	15.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Sioux Falls MSA	802	8,635	100.0	7,939	0.0	0.0	0.0	37.0	31.0	31.8	34.9	32.4	37.1	28.2	36.5	31.1	0.0	0.0	0.0		
Total	802	8,635	100.0	7,939	0.0	0.0	0.0	37.0	31.0	31.8	34.9	32.4	37.1	28.2	36.5	31.1	0.0	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Sioux Falls MSA	2,014	22,639	100.0	6,506	10.0	3.4	5.0	23.7	22.2	23.8	41.9	43.2	46.2	21.9	29.4	22.9	2.5	1.7	2.2	
Total	2,014	22,639	100.0	6,506	10.0	3.4	5.0	23.7	22.2	23.8	41.9	43.2	46.2	21.9	29.4	22.9	2.5	1.7	2.2	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Sioux Falls MSA	802	8,635	100.0	7,939	87.1	68.8	52.4	4.1	18.5	8.8	12.7
Total	802	8,635	100.0	7,939	87.1	68.8	52.4	4.1	18.5	8.8	12.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Sioux Falls MSA	2,014	22,639	100.0	6,506	90.7	76.1	52.2	2.7	13.3	6.6	10.7
Total	2,014	22,639	100.0	6,506	90.7	76.1	52.2	2.7	13.3	6.6	10.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Sioux Falls MSA	34	289	100.0	1,076	0.0	0.0	0.0	11.2	8.8	1.0	59.8	70.6	76.7	29.0	20.6	22.3	0.0	0.0	0.0
Total	34	289	100.0	1,076	0.0	0.0	0.0	11.2	8.8	1.0	59.8	70.6	76.7	29.0	20.6	22.3	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Sioux Falls MSA	57	654	100.0	673	2.9	0.0	0.3	10.1	1.8	1.3	63.5	63.2	85.4	23.1	29.8	12.8	0.4	5.3	0.1	
Total	57	654	100.0	673	2.9	0.0	0.3	10.1	1.8	1.3	63.5	63.2	85.4	23.1	29.8	12.8	0.4	5.3	0.1	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Sioux Falls MSA	34	289	100.0	1,076	98.1	73.5	78.6	1.2	11.8	0.7	14.7
Total	34	289	100.0	1,076	98.1	73.5	78.6	1.2	11.8	0.7	14.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Sioux Falls MSA	57	654	100.0	673	98.6	75.4	73.1	0.8	10.5	0.6	14.0
Total	57	654	100.0	673	98.6	75.4	73.1	0.8	10.5	0.6	14.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	4,015	1,742,689	100.0	132,868	3.8	5.8	4.6	16.0	11.5	13.4	41.6	30.9	39.8	38.6	51.7	42.1	0.1	0.1	0.1
Total	4,015	1,742,689	100.0	132,868	3.8	5.8	4.6	16.0	11.5	13.4	41.6	30.9	39.8	38.6	51.7	42.1	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	2,000	1,157,349	100.0	79,652	2.3	3.1	2.8	17.0	19.9	16.0	41.4	33.1	40.2	38.7	43.3	40.0	0.6	0.7	0.9
Total	2,000	1,157,349	100.0	79,652	2.3	3.1	2.8	17.0	19.9	16.0	41.4	33.1	40.2	38.7	43.3	40.0	0.6	0.7	0.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	4,015	1,742,689	100.0	132,868	20.0	3.3	4.7	17.1	17.0	15.6	20.1	15.4	19.1	42.8	60.0	41.5	0.0	4.2	19.1
Total	4,015	1,742,689	100.0	132,868	20.0	3.3	4.7	17.1	17.0	15.6	20.1	15.4	19.1	42.8	60.0	41.5	0.0	4.2	19.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	2,000	1,157,349	100.0	79,652	19.8	8.0	6.4	17.2	20.7	17.5	21.2	16.6	20.0	41.8	49.3	40.8	0.0	5.5	15.3
Total	2,000	1,157,349	100.0	79,652	19.8	8.0	6.4	17.2	20.7	17.5	21.2	16.6	20.0	41.8	49.3	40.8	0.0	5.5	15.3
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	8,700	98,283	100.0	53,715	8.0	7.0	8.0	18.5	13.8	18.1	29.3	26.8	29.9	43.4	51.5	43.2	0.8	0.8	0.8
Total	8,700	98,283	100.0	53,715	8.0	7.0	8.0	18.5	13.8	18.1	29.3	26.8	29.9	43.4	51.5	43.2	0.8	0.8	0.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	20,153	242,003	100.0	50,384	4.2	2.6	3.6	20.5	15.2	19.7	30.0	27.3	31.3	42.7	52.7	43.0	2.6	2.3	2.3
Total	20,153	242,003	100.0	50,384	4.2	2.6	3.6	20.5	15.2	19.7	30.0	27.3	31.3	42.7	52.7	43.0	2.6	2.3	2.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Nashville CSA	8,700	98,283	100.0	53,715	88.3	66.8	48.4	3.6	19.5	8.1	13.8
Total	8,700	98,283	100.0	53,715	88.3	66.8	48.4	3.6	19.5	8.1	13.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Nashville CSA	20,153	242,003	100.0	50,384	91.0	70.6	51.1	2.7	18.3	6.4	11.0
Total	20,153	242,003	100.0	50,384	91.0	70.6	51.1	2.7	18.3	6.4	11.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	61	676	100.0	447	4.1	0.0	2.0	14.2	8.2	10.7	41.4	52.5	59.7	39.7	37.7	27.1	0.5	1.6	0.4
Total	61	676	100.0	447	4.1	0.0	2.0	14.2	8.2	10.7	41.4	52.5	59.7	39.7	37.7	27.1	0.5	1.6	0.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Nashville CSA	176	2,001	100.0	297	2.4	0.0	0.0	17.7	18.8	27.6	37.9	39.8	42.4	40.7	40.9	30.0	1.3	0.6	0.0
Total	176	2,001	100.0	297	2.4	0.0	0.0	17.7	18.8	27.6	37.9	39.8	42.4	40.7	40.9	30.0	1.3	0.6	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Nashville CSA	61	676	100.0	447	96.3	70.5	62.0	1.7	13.1	2.0	16.4
Total	61	676	100.0	447	96.3	70.5	62.0	1.7	13.1	2.0	16.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Nashville CSA	176	2,001	100.0	297	97.2	79.5	58.2	1.2	10.8	1.6	9.7
Total	176	2,001	100.0	297	97.2	79.5	58.2	1.2	10.8	1.6	9.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Dallas CSA	27,995	10,018,551	38.9	402,442	4.9	2.2	2.6	19.0	10.6	11.3	32.8	25.3	33.6	43.2	61.7	52.3	0.1	0.2	0.1	
Houston MSA	22,699	7,414,944	31.5	303,295	5.3	2.8	2.6	20.9	10.3	12.3	29.2	19.2	26.6	44.6	67.7	58.4	0.1	0.1	0.1	
Limited-Scope:																				
Abilene MSA	289	69,518	0.4	6,313	0.0	0.0	0.0	19.4	3.1	10.7	34.6	18.7	23.9	46.0	78.2	65.3	0.0	0.0	0.1	
Amarillo CSA	316	71,697	0.4	11,827	1.0	0.0	0.2	22.9	5.7	9.8	34.8	23.7	33.5	41.3	70.6	56.5	0.0	0.0	0.0	
Austin MSA	10,642	4,555,747	14.8	158,679	3.8	3.9	3.5	18.1	12.1	13.9	40.3	37.6	43.3	37.6	46.2	39.1	0.2	0.2	0.2	
Beaumont MSA	334	68,011	0.5	9,117	4.2	1.5	1.6	20.7	6.6	8.0	44.0	42.5	47.9	31.1	49.4	42.4	0.0	0.0	0.0	
Brownsville CSA	234	41,642	0.3	8,268	0.0	0.0	0.0	29.1	10.7	13.1	29.9	15.8	25.0	40.9	73.5	61.9	0.0	0.0	0.0	
College Station MSA	681	174,034	0.9	9,024	2.3	2.3	4.1	27.6	16.0	22.6	23.6	26.0	24.2	46.6	55.7	49.0	0.0	0.0	0.0	
El Paso CSA	633	114,333	0.9	26,213	1.8	0.2	0.5	24.7	9.3	12.3	33.2	24.3	27.8	40.2	66.2	59.5	0.0	0.0	0.0	
Killeen MSA	356	72,510	0.5	20,500	1.0	0.0	0.4	9.2	3.7	4.9	52.0	41.9	52.6	37.9	54.5	42.1	0.0	0.0	0.0	
Laredo MSA	99	18,397	0.1	6,204	1.1	0.0	0.2	33.8	14.1	16.9	31.7	14.1	26.8	33.3	71.7	56.1	0.0	0.0	0.0	
Longview MSA	185	33,407	0.3	5,828	0.9	0.0	0.6	16.9	7.0	7.3	51.8	47.6	52.4	30.4	45.4	39.8	0.0	0.0	0.0	
Lubbock CSA	379	84,160	0.5	15,333	2.5	0.8	1.4	16.4	4.5	8.2	38.2	34.0	43.6	42.9	60.7	46.9	0.0	0.0	0.0	
McAllen CSA	463	88,636	0.6	15,736	1.4	0.0	0.3	24.6	11.0	12.7	42.3	29.2	37.4	31.5	59.6	49.4	0.2	0.2	0.2	
Midland CSA	699	201,600	1.0	14,452	2.2	0.7	1.1	17.3	4.7	7.1	42.2	27.0	31.3	38.2	67.5	60.6	0.0	0.0	0.0	

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
San Antonio CSA	5,013	1,391,384	7.0	120,048	4.6	1.0	1.5	24.5	9.4	12.1	28.4	23.2	30.7	42.5	66.4	55.7	0.0	0.0	0.0
Tyler CSA	312	75,123	0.4	9,368	0.9	0.3	0.5	19.9	7.1	12.2	40.9	38.8	40.8	38.3	53.8	46.4	0.0	0.0	0.0
Waco MSA	386	85,885	0.5	9,828	4.5	3.6	4.8	22.1	13.0	15.4	26.9	17.9	19.7	46.4	65.5	60.2	0.0	0.0	0.0
Wichita Falls MSA	92	13,611	0.1	4,556	6.1	2.2	1.8	23.7	17.4	17.5	26.6	23.9	25.5	43.6	56.5	55.3	0.0	0.0	0.0
Non-MSA TX	181	65,848	0.3	3,080	0.0	0.0	0.0	16.5	8.8	16.7	34.0	32.0	31.6	49.4	59.1	51.7	0.0	0.0	0.0
Total	71,988	24,659,038	100.0	1,160,111	4.2	2.4	2.4	20.7	10.5	12.0	33.1	25.3	33.1	42.0	61.6	52.5	0.1	0.1	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Dallas CSA	10,238	4,654,558	36.4	250,356	4.1	3.4	3.4	19.9	16.7	14.9	33.8	30.6	36.3	41.9	48.8	45.0	0.3	0.4	0.4
Houston MSA	8,596	3,013,704	30.6	184,445	5.0	4.0	3.5	19.5	16.4	15.3	30.8	26.9	31.5	43.9	51.4	48.8	0.9	1.2	0.9
Limited-Scope:																			
Abilene MSA	113	24,535	0.4	4,084	3.7	1.8	2.1	21.9	22.1	18.2	31.5	22.1	26.1	42.9	54.0	53.5	0.0	0.0	0.2
Amarillo CSA	167	38,384	0.6	7,611	3.3	3.6	2.1	21.9	16.8	14.9	28.2	22.2	28.1	46.5	57.5	54.7	0.0	0.0	0.1
Austin MSA	3,952	2,299,497	14.1	92,652	2.6	2.5	1.9	19.9	17.6	19.4	39.4	36.2	43.2	37.6	43.0	35.0	0.5	0.8	0.6
Beaumont MSA	197	37,383	0.7	6,671	4.2	4.6	1.9	21.8	21.3	13.9	27.9	21.3	28.7	43.8	51.8	53.6	2.3	1.0	1.8
Brownsville CSA	183	34,560	0.7	5,796	1.2	1.1	0.7	20.3	10.9	13.0	41.5	32.8	35.8	36.3	54.1	50.0	0.7	1.1	0.4
College Station MSA	266	77,536	0.9	5,578	4.2	2.6	4.4	15.7	14.3	13.7	29.4	26.7	26.9	50.4	54.9	53.8	0.3	1.5	1.3
El Paso CSA	447	93,420	1.6	17,301	1.3	1.1	0.8	25.3	15.7	17.1	32.0	23.7	25.9	41.4	59.5	56.2	0.0	0.0	0.0
Killeen MSA	220	49,059	0.8	14,100	2.5	3.6	2.4	17.5	17.7	16.6	38.4	40.0	39.4	41.3	38.2	41.6	0.3	0.5	0.1
Laredo MSA	64	12,937	0.2	3,973	2.9	0.0	1.6	32.7	17.2	23.8	16.1	12.5	13.6	48.4	70.3	60.7	0.0	0.0	0.4
Longview MSA	82	13,149	0.3	4,172	0.0	0.0	0.0	19.2	23.2	19.3	57.8	62.2	55.8	23.0	14.6	24.9	0.0	0.0	0.0
Lubbock CSA	241	359,404	0.9	10,347	4.6	1.2	2.7	16.3	11.6	12.2	41.9	49.4	42.7	36.1	36.9	41.2	1.1	0.8	1.2
McAllen CSA	313	68,112	1.1	11,764	5.1	1.3	1.6	19.0	10.2	9.7	40.6	39.9	39.7	33.0	45.7	45.3	2.2	2.9	3.8
Midland CSA	307	85,477	1.1	10,714	2.7	0.7	1.3	20.6	10.1	9.6	43.3	47.9	46.6	33.0	41.0	42.0	0.4	0.3	0.5

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
San Antonio CSA	2,312	693,898	8.2	78,153	4.2	1.9	1.9	25.2	17.7	15.3	33.2	34.3	37.0	37.0	45.8	45.1	0.4	0.2	0.6
Tyler CSA	132	34,011	0.5	6,392	1.0	3.0	1.1	18.8	18.2	15.9	44.6	34.1	46.9	34.5	43.9	35.2	1.1	0.8	0.9
Waco MSA	150	38,323	0.5	6,479	6.7	6.7	7.0	21.9	22.0	19.8	32.1	32.0	32.8	39.0	39.3	39.9	0.2	0.0	0.5
Wichita Falls MSA	70	11,991	0.2	3,113	3.5	1.4	1.8	21.3	8.6	13.8	63.2	75.7	70.1	12.0	14.3	14.3	0.0	0.0	0.0
Non-MSA TX	65	29,864	0.2	2,031	0.0	0.0	0.0	6.1	7.7	4.8	40.7	41.5	40.3	53.2	50.8	54.9	0.0	0.0	0.0
Total	28,115	11,669,802	100.0	725,732	4.0	3.2	2.8	20.5	16.6	15.6	34.1	31.0	36.1	40.8	48.4	44.9	0.6	0.7	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Dallas CSA	27,995	10,018,551	38.9	402,442	23.3	4.0	3.3	16.6	15.5	12.8	18.3	18.4	18.6	41.9	56.0	42.8	0.0	6.2	22.5	
Houston MSA	22,699	7,414,944	31.5	303,295	24.4	3.0	2.6	16.1	14.7	11.9	17.0	16.5	18.6	42.5	61.3	44.4	0.0	4.5	22.5	
Limited-Scope:																				
Abilene MSA	289	69,518	0.4	6,313	21.3	2.8	2.0	17.7	10.4	10.9	20.1	16.6	18.5	40.9	69.6	39.9	0.0	0.7	28.7	
Amarillo CSA	316	71,697	0.4	11,827	22.0	4.1	4.0	17.0	16.5	13.5	19.7	21.5	17.4	41.3	57.0	32.4	0.0	0.9	32.7	
Austin MSA	10,642	4,555,747	14.8	158,679	22.5	3.3	3.3	16.9	15.0	12.8	19.8	19.6	18.4	40.8	58.2	45.0	0.0	3.9	20.5	
Beaumont MSA	334	68,011	0.5	9,117	23.3	2.4	2.1	17.3	11.1	10.8	18.8	17.1	17.9	40.6	65.9	43.6	0.0	3.6	25.7	
Brownsville CSA	234	41,642	0.3	8,268	24.6	1.3	0.5	16.6	6.4	5.1	15.7	15.0	13.3	43.0	72.2	53.3	0.0	5.1	27.9	
College Station MSA	681	174,034	0.9	9,024	24.5	2.2	2.1	15.8	11.9	11.9	16.9	18.5	17.6	42.8	65.3	46.7	0.0	2.1	21.6	
El Paso CSA	633	114,333	0.9	26,213	22.3	1.4	1.4	17.4	8.5	7.5	19.1	16.6	17.5	41.2	64.6	45.9	0.0	8.8	27.7	
Killeen MSA	356	72,510	0.5	20,500	20.1	2.8	1.6	18.5	13.2	10.1	20.9	19.4	18.5	40.5	56.2	33.3	0.0	8.4	36.4	
Laredo MSA	99	18,397	0.1	6,204	25.6	1.0	1.4	15.4	7.1	9.0	16.8	13.1	19.2	42.3	69.7	39.7	0.0	9.1	30.7	
Longview MSA	185	33,407	0.3	5,828	22.0	3.8	3.6	16.3	19.5	12.2	18.7	16.8	19.9	43.0	51.4	41.1	0.0	8.6	23.3	
Lubbock CSA	379	84,160	0.5	15,333	22.1	4.0	3.2	16.4	11.1	12.2	19.5	23.0	16.1	41.9	59.4	38.2	0.0	2.6	30.4	
McAllen CSA	463	88,636	0.6	15,736	25.1	1.1	0.6	16.3	3.5	4.2	15.4	11.4	11.8	43.2	78.6	51.1	0.0	5.4	32.3	
Midland CSA	699	201,600	1.0	14,452	21.8	3.0	4.8	17.4	13.3	17.7	20.4	23.0	20.4	40.5	57.4	27.7	0.0	3.3	29.5	
San Antonio CSA	5,013	1,391,384	7.0	120,048	22.8	2.4	2.6	17.4	11.9	11.8	19.2	21.0	18.7	40.6	58.9	35.2	0.0	5.7	31.7	

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Tyler CSA	312	75,123	0.4	9,368	21.9	3.5	4.2	17.7	13.5	15.2	18.7	20.2	19.9	41.7	55.1	39.3	0.0	7.7	21.4
Waco MSA	386	85,885	0.5	9,828	22.5	3.9	1.8	17.7	11.1	9.4	18.0	17.6	18.2	41.8	64.5	46.7	0.0	2.9	24.0
Wichita Falls MSA	92	13,611	0.1	4,556	22.5	4.3	4.4	16.5	19.6	15.5	20.8	23.9	20.4	40.2	45.7	32.7	0.0	6.5	27.0
Non-MSA TX	181	65,848	0.3	3,080	18.6	0.0	1.8	15.5	9.4	6.8	17.2	18.8	16.2	48.7	67.4	54.7	0.0	4.4	20.6
Total	71,988	24,659,038	100.0	1,160,111	23.4	3.4	2.9	16.6	14.6	12.1	18.1	18.2	18.4	41.9	58.7	42.4	0.0	5.2	24.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Dallas CSA	10,238	4,654,558	36.4	250,356	21.9	5.8	3.6	17.4	17.9	12.8	19.3	19.6	20.2	41.4	48.7	42.6	0.0	8.0	20.8	
Houston MSA	8,596	3,013,704	30.6	184,445	23.5	6.2	3.7	16.6	18.2	14.2	17.9	17.9	20.0	42.0	52.5	41.4	0.0	5.2	20.8	
Limited-Scope:																				
Abilene MSA	113	24,535	0.4	4,084	19.5	6.2	4.5	18.7	23.9	15.9	20.3	23.9	19.8	41.6	43.4	34.8	0.0	2.7	25.0	
Amarillo CSA	167	38,384	0.6	7,611	22.0	8.4	4.8	17.4	21.6	14.3	19.6	23.4	18.2	41.0	46.7	34.9	0.0	0.0	27.8	
Austin MSA	3,952	2,299,497	14.1	92,652	21.2	4.8	3.9	17.7	14.9	12.9	21.1	19.0	20.1	40.0	56.5	45.5	0.0	4.9	17.6	
Beaumont MSA	197	37,383	0.7	6,671	23.4	8.6	4.8	17.8	25.4	16.3	17.6	20.8	21.3	41.1	41.6	34.3	0.0	3.6	23.3	
Brownsville CSA	183	34,560	0.7	5,796	24.3	3.8	1.2	17.1	10.9	6.3	17.0	22.4	15.9	41.6	59.6	52.7	0.0	3.3	23.9	
College Station MSA	266	77,536	0.9	5,578	23.6	4.1	2.6	16.6	10.2	10.7	17.3	25.6	17.9	42.5	57.9	47.7	0.0	2.3	21.0	
El Paso CSA	447	93,420	1.6	17,301	21.9	3.1	1.7	17.8	12.3	7.8	18.5	19.9	21.1	41.7	60.2	47.6	0.0	4.5	21.8	
Killeen MSA	220	49,059	0.8	14,100	21.6	5.5	2.2	17.4	17.3	12.6	20.8	18.6	22.7	40.3	56.8	39.4	0.0	1.8	23.0	
Laredo MSA	64	12,937	0.2	3,973	25.8	3.1	2.2	14.7	10.9	12.2	17.6	17.2	23.2	41.9	65.6	33.9	0.0	3.1	28.6	
Longview MSA	82	13,149	0.3	4,172	22.5	17.1	4.5	17.2	23.2	14.9	19.8	23.2	21.0	40.5	34.1	38.6	0.0	2.4	21.0	
Lubbock CSA	241	359,404	0.9	10,347	22.7	7.1	4.0	16.3	20.7	11.5	19.5	18.7	16.8	41.5	51.0	37.9	0.0	2.5	29.8	
McAllen CSA	313	68,112	1.1	11,764	26.1	3.8	0.8	15.2	6.7	5.0	16.2	19.8	14.5	42.5	66.5	51.0	0.0	3.2	28.6	
Midland CSA	307	85,477	1.1	10,714	22.2	8.1	6.6	17.8	23.5	20.3	18.2	23.8	22.1	41.8	41.0	22.8	0.0	3.6	28.2	
San Antonio CSA	2,312	693,898	8.2	78,153	22.3	4.8	3.1	17.4	21.2	14.0	19.6	21.0	20.5	40.7	48.8	38.0	0.0	4.2	24.3	

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Tyler CSA	132	34,011	0.5	6,392	21.0	7.6	6.0	17.5	22.7	14.8	21.2	24.2	20.5	40.3	41.7	37.2	0.0	3.8	21.6
Waco MSA	150	38,323	0.5	6,479	23.4	4.7	3.4	17.3	21.3	13.4	17.1	20.7	19.4	42.2	49.3	43.5	0.0	4.0	20.3
Wichita Falls MSA	70	11,991	0.2	3,113	21.6	8.6	5.9	19.1	27.1	16.0	21.0	21.4	20.8	38.3	42.9	32.2	0.0	0.0	25.1
Non-MSA TX	65	29,864	0.2	2,031	16.1	1.5	1.2	17.1	4.6	9.0	19.6	6.2	14.2	47.2	84.6	57.1	0.0	3.1	18.6
Total	28,115	11,669,802	100.0	725,732	22.6	5.7	3.6	17.1	17.7	13.2	18.9	19.3	20.1	41.4	51.4	41.8	0.0	5.8	21.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Dallas CSA	69,326	1,897,514	35.0	243,104	6.7	5.5	6.8	17.7	15.3	18.3	28.2	24.8	27.5	46.8	53.7	46.8	0.6	0.6	0.6
Houston MSA	72,282	1,784,521	36.5	234,656	9.1	8.0	9.4	17.7	14.4	18.4	23.0	20.6	24.3	50.0	56.8	47.8	0.2	0.1	0.1
Limited-Scope:																			
Abilene MSA	371	5,213	0.2	3,184	0.0	0.0	0.0	27.5	20.2	22.6	30.7	25.6	32.2	40.9	54.2	45.0	1.0	0.0	0.2
Amarillo CSA	937	12,985	0.5	6,713	5.5	5.2	4.8	23.8	13.1	20.5	30.0	23.1	28.3	40.5	58.2	46.3	0.2	0.4	0.1
Austin MSA	25,667	641,426	13.0	73,528	6.2	6.9	6.7	13.0	11.9	14.4	34.0	32.4	35.3	45.6	48.0	42.7	1.2	0.7	0.8
Beaumont MSA	1,013	19,268	0.5	6,856	5.0	4.1	5.3	21.9	16.4	20.3	47.1	48.6	45.9	25.9	30.9	28.4	0.1	0.0	0.0
Brownsville CSA	1,132	20,263	0.6	8,826	0.0	0.0	0.0	30.1	20.8	29.8	27.7	26.3	29.1	41.9	52.7	40.9	0.3	0.1	0.2
College Station MSA	1,088	15,953	0.5	5,218	7.4	4.7	4.6	25.4	20.2	26.4	25.2	25.0	25.3	41.6	50.1	43.7	0.3	0.0	0.1
El Paso CSA	3,376	88,844	1.7	16,663	6.6	7.1	6.1	26.2	22.2	27.4	29.8	28.2	28.9	36.6	41.8	37.2	0.7	0.7	0.4
Killeen MSA	914	14,438	0.5	5,518	4.7	2.7	4.2	13.3	9.1	10.3	49.1	47.6	48.9	32.9	40.5	36.6	0.1	0.1	0.0
Laredo MSA	768	22,780	0.4	8,127	0.9	1.2	0.7	31.7	27.6	29.2	17.3	15.0	15.3	49.8	56.3	54.5	0.4	0.0	0.2
Longview MSA	719	13,987	0.4	5,668	6.1	3.1	5.0	14.8	10.3	12.2	50.1	49.7	50.5	28.8	36.9	31.9	0.2	0.1	0.5
Lubbock CSA	1,222	13,987	0.6	7,810	3.4	2.0	2.8	14.9	10.4	12.9	36.1	33.4	36.4	45.4	54.3	48.0	0.1	0.0	0.0
McAllen CSA	2,626	62,320	1.3	17,577	0.5	0.5	0.6	18.9	16.6	19.2	34.2	29.0	35.4	46.2	53.7	44.5	0.2	0.2	0.3

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Midland CSA	1,852	44,719	0.9	10,956	1.5	0.9	1.9	21.7	15.0	19.0	34.6	33.8	37.0	41.9	50.2	41.8	0.4	0.1	0.3		
San Antonio CSA	11,946	244,609	6.0	50,413	4.4	2.9	4.0	20.5	15.2	20.2	28.4	24.4	27.1	46.4	57.5	48.5	0.2	0.2	0.2		
Tyler CSA	868	13,726	0.4	6,951	6.2	4.5	5.8	17.3	13.2	17.6	34.9	33.2	33.4	41.5	49.0	42.9	0.2	0.1	0.3		
Waco MSA	852	12,824	0.4	4,108	5.1	5.2	4.6	30.3	26.6	26.6	24.8	25.6	26.8	39.3	42.5	41.5	0.6	0.1	0.4		
Wichita Falls MSA	419	8,601	0.2	1,670	4.5	3.8	4.1	31.8	28.2	29.2	17.0	15.8	17.1	46.6	52.3	49.5	0.1	0.0	0.1		
Non-MSA TX	600	10,352	0.3	2,825	0.0	0.0	0.0	20.0	8.3	16.1	35.1	28.0	35.4	44.9	63.7	48.5	0.0	0.0	0.0		
Total	197,978	4,948,330	100.0	720,371	6.7	6.2	6.8	18.2	14.7	18.6	28.2	24.8	28.2	46.5	53.8	46.0	0.5	0.4	0.4		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Dallas CSA	110,365	1,583,182	34.1	244,452	4.7	2.8	4.2	17.9	14.0	18.3	31.2	27.7	30.6	45.3	54.6	46.1	0.9	0.9	0.8
Houston MSA	116,883	1,690,300	36.1	228,948	8.7	6.0	7.9	18.8	14.3	18.4	25.0	22.9	25.9	45.4	55.4	46.3	2.1	1.4	1.5
Limited-Scope:																			
Abilene MSA	685	8,691	0.2	3,209	3.8	1.2	3.2	24.3	19.3	23.7	33.5	32.7	34.0	38.1	46.9	38.9	0.3	0.0	0.2
Amarillo CSA	1,563	18,520	0.5	5,962	7.3	7.1	7.1	24.3	16.2	21.5	22.5	16.3	21.6	45.7	60.2	49.8	0.2	0.2	0.1
Austin MSA	44,217	630,859	13.7	77,682	2.8	2.8	3.3	14.8	16.0	19.4	32.0	30.4	32.8	45.2	49.4	42.6	5.2	1.4	1.9
Beaumont MSA	1,699	26,940	0.5	6,917	4.0	3.6	3.9	27.9	22.5	25.2	23.2	24.3	24.7	39.5	43.7	41.1	5.4	5.8	5.2
Brownsville CSA	1,769	22,176	0.5	7,856	2.7	2.2	1.8	25.6	19.4	25.5	35.9	35.5	36.4	34.6	42.0	35.4	1.2	0.9	0.9
College Station MSA	2,014	24,302	0.6	5,090	8.0	4.0	6.3	19.3	16.0	18.7	25.9	24.8	26.6	44.9	54.9	47.7	2.0	0.3	0.6
El Paso CSA	5,093	76,088	1.6	17,110	4.1	4.2	4.3	32.6	26.6	31.4	25.1	22.8	26.3	37.7	46.0	37.5	0.5	0.5	0.4
Killeen MSA	1,958	22,061	0.6	6,119	5.5	3.8	4.4	25.0	19.1	22.0	32.3	31.1	32.9	36.6	46.0	40.4	0.6	0.1	0.2
Laredo MSA	1,137	17,849	0.4	8,391	4.8	2.3	2.9	24.3	24.5	21.5	14.6	10.8	12.2	55.9	61.8	63.0	0.4	0.6	0.3
Longview MSA	1,155	16,761	0.4	5,335	0.0	0.0	0.0	24.6	20.9	23.4	53.1	51.4	52.0	22.0	27.6	23.9	0.2	0.1	0.7
Lubbock CSA	2,418	28,492	0.7	7,241	4.2	2.8	3.4	15.8	12.1	15.2	36.2	31.8	35.1	41.7	52.2	44.6	2.0	1.1	1.7
McAllen CSA	4,479	68,066	1.4	17,266	3.2	2.3	3.0	14.8	11.7	15.6	36.5	32.6	36.8	42.0	49.4	41.2	3.6	4.1	3.5

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Midland CSA	3,207	39,808	1.0	10,488	2.3	1.9	2.4	24.1	17.4	20.7	35.9	35.3	39.4	37.0	45.0	36.8	0.7	0.4	0.7
San Antonio CSA	20,517	269,151	6.3	50,333	5.0	3.3	4.9	21.8	15.6	21.1	27.4	24.1	27.2	45.0	56.3	46.1	0.7	0.7	0.7
Tyler CSA	1,691	22,576	0.5	6,707	1.8	1.0	1.8	21.7	16.4	19.4	42.0	41.3	43.4	33.7	41.0	34.3	0.6	0.3	1.0
Waco MSA	1,531	16,969	0.5	4,595	11.2	8.8	9.5	24.5	18.2	21.3	28.7	29.2	30.7	34.5	43.8	38.0	1.0	0.1	0.6
Wichita Falls MSA	608	9,423	0.2	1,735	12.3	10.2	11.1	21.3	18.1	22.0	51.9	55.1	51.0	14.3	16.6	15.9	0.1	0.0	0.0
Non-MSA TX	904	11,367	0.3	2,701	0.0	0.0	0.0	10.5	6.3	8.9	42.1	47.8	44.7	47.4	45.9	46.5	0.0	0.0	0.0
Total	323,893	4,603,581	100.0	718,137	5.6	4.0	5.2	18.8	14.9	19.2	29.3	26.4	29.4	44.4	53.5	44.9	1.9	1.2	1.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Dallas CSA	69,326	1,897,514	35.0	243,104	88.4	61.9	43.0	3.5	15.1	8.1	23.1
Houston MSA	72,282	1,784,521	36.5	234,656	88.3	62.3	42.2	4.0	15.2	7.7	22.5
Limited-Scope:											
Abilene MSA	371	5,213	0.2	3,184	83.1	66.3	38.6	4.4	16.4	12.5	17.3
Amarillo CSA	937	12,985	0.5	6,713	84.4	57.5	45.1	4.2	24.2	11.4	18.3
Austin MSA	25,667	641,426	13.0	73,528	89.4	64.2	45.2	3.0	14.6	7.6	21.2
Beaumont MSA	1,013	19,268	0.5	6,856	83.2	60.3	39.4	4.2	19.5	12.6	20.1
Brownsville CSA	1,132	20,263	0.6	8,826	84.1	61.7	37.8	3.7	18.7	12.2	19.6
College Station MSA	1,088	15,953	0.5	5,218	83.5	66.4	46.8	3.8	15.8	12.7	17.8
El Paso CSA	3,376	88,844	1.7	16,663	84.9	56.0	42.4	3.9	19.6	11.1	24.4
Killeen MSA	914	14,438	0.5	5,518	86.8	67.3	46.0	2.6	12.1	10.6	20.6
Laredo MSA	768	22,780	0.4	8,127	84.1	54.6	43.7	5.2	21.1	10.7	24.3
Longview MSA	719	13,987	0.4	5,668	81.7	62.4	42.0	4.8	18.9	13.5	18.6
Lubbock CSA	1,222	13,987	0.6	7,810	86.1	61.9	40.8	3.6	24.1	10.2	14.0
McAllen CSA	2,626	62,320	1.3	17,577	87.0	61.2	37.9	3.3	18.7	9.8	20.1
Midland CSA	1,852	44,719	0.9	10,956	83.9	52.9	36.2	5.1	23.2	11.0	23.9
San Antonio CSA	11,946	244,609	6.0	50,413	87.3	62.3	43.7	3.5	17.7	9.2	20.0
Tyler CSA	868	13,726	0.4	6,951	86.1	64.7	46.5	3.9	15.8	10.0	19.5
Waco MSA	852	12,824	0.4	4,108	84.2	65.8	41.2	4.5	16.1	11.2	18.1
Wichita Falls MSA	419	8,601	0.2	1,670	82.6	53.5	46.1	4.5	21.2	12.9	25.3
Non-MSA TX	600	10,352	0.3	2,825	88.6	63.0	48.4	3.4	16.5	8.0	20.5
Total	197,978	4,948,330	100.0	720,371	87.8	62.2	42.8	3.7	15.6	8.5	22.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Dallas CSA	110,365	1,583,182	34.1	244,452	92.4	74.9	49.2	2.2	14.9	5.5	10.2
Houston MSA	116,883	1,690,300	36.1	228,948	92.6	74.2	50.1	2.3	16.1	5.1	9.7
Limited-Scope:											
Abilene MSA	685	8,691	0.2	3,209	87.1	67.4	51.6	3.2	19.1	9.7	13.4
Amarillo CSA	1,563	18,520	0.5	5,962	88.6	60.2	47.6	2.9	25.1	8.5	14.7
Austin MSA	44,217	630,859	13.7	77,682	94.0	74.1	48.9	1.6	14.1	4.5	11.8
Beaumont MSA	1,699	26,940	0.5	6,917	87.3	67.8	44.0	3.0	22.2	9.6	10.0
Brownsville CSA	1,769	22,176	0.5	7,856	88.8	70.2	49.5	2.5	20.3	8.8	9.6
College Station MSA	2,014	24,302	0.6	5,090	88.1	69.7	51.9	2.5	17.5	9.4	12.8
El Paso CSA	5,093	76,088	1.6	17,110	89.0	69.4	50.6	2.7	20.1	8.3	10.5
Killeen MSA	1,958	22,061	0.6	6,119	90.8	73.3	52.4	1.7	14.1	7.5	12.6
Laredo MSA	1,137	17,849	0.4	8,391	89.6	68.6	40.1	3.3	24.5	7.2	6.9
Longview MSA	1,155	16,761	0.4	5,335	86.3	70.3	48.1	3.4	19.0	10.4	10.7
Lubbock CSA	2,418	28,492	0.7	7,241	89.6	64.5	47.3	2.5	23.3	8.0	12.2
McAllen CSA	4,479	68,066	1.4	17,266	90.8	72.5	45.5	2.2	19.3	7.0	8.1
Midland CSA	3,207	39,808	1.0	10,488	88.6	65.2	40.6	3.4	24.5	8.0	10.3
San Antonio CSA	20,517	269,151	6.3	50,333	91.0	71.3	46.4	2.3	17.6	6.7	11.1
Tyler CSA	1,691	22,576	0.5	6,707	89.8	71.9	52.1	2.7	16.0	7.5	12.1
Waco MSA	1,531	16,969	0.5	4,595	88.3	70.3	48.1	3.1	16.7	8.7	12.9
Wichita Falls MSA	608	9,423	0.2	1,735	86.7	66.8	52.0	3.2	21.1	10.1	12.2
Non-MSA TX	904	11,367	0.3	2,701	91.5	66.7	54.4	2.4	18.7	6.1	14.6
Total	323,893	4,603,581	100.0	718,137	92.1	73.7	49.0	2.2	15.9	5.7	10.4
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Dallas CSA	488	6,232	30.6	1,714	4.1	0.8	0.9	15.3	10.7	11.8	34.1	32.0	44.9	46.0	56.1	42.1	0.4	0.4	0.2
Houston MSA	449	5,380	28.2	1,009	5.1	4.0	2.6	15.4	8.5	13.6	30.1	31.4	38.8	49.3	55.9	45.0	0.1	0.2	0.1
Limited-Scope:																			
Abilene MSA	10	110	0.6	132	0.0	0.0	0.0	12.2	0.0	2.3	30.0	20.0	42.4	57.5	70.0	55.3	0.3	10.0	0.0
Amarillo CSA	45	551	2.8	423	2.5	0.0	0.5	11.9	4.4	2.6	27.1	31.1	22.2	58.6	64.4	74.7	0.0	0.0	0.0
Austin MSA	199	2,449	12.5	434	4.5	2.0	1.6	16.3	10.1	23.0	39.4	46.2	47.9	39.4	40.7	27.4	0.4	1.0	0.0
Beaumont MSA	15	232	0.9	80	3.2	0.0	0.0	13.2	6.7	3.8	44.6	60.0	27.5	38.9	33.3	68.8	0.0	0.0	0.0
Brownsville CSA	26	265	1.6	94	0.0	0.0	0.0	21.6	3.8	16.0	33.4	23.1	43.6	44.8	73.1	40.4	0.2	0.0	0.0
College Station MSA	17	113	1.1	99	3.7	0.0	1.0	19.6	5.9	14.1	26.7	17.6	31.3	49.9	76.5	53.5	0.0	0.0	0.0
El Paso CSA	14	274	0.9	39	2.9	0.0	0.0	29.2	42.9	28.2	27.5	21.4	15.4	40.2	35.7	56.4	0.3	0.0	0.0
Killeen MSA	8	61	0.5	105	3.3	0.0	0.0	8.1	0.0	1.0	46.7	37.5	44.8	41.9	62.5	54.3	0.0	0.0	0.0
Laredo MSA	6	66	0.4	73	0.4	0.0	0.0	31.4	33.3	49.3	19.1	0.0	5.5	48.7	66.7	45.2	0.4	0.0	0.0
Longview MSA	7	68	0.4	112	2.0	0.0	0.0	13.9	0.0	9.8	52.1	28.6	59.8	32.0	71.4	30.4	0.0	0.0	0.0
Lubbock CSA	74	762	4.6	542	1.2	4.1	0.9	8.3	1.4	2.2	35.8	24.3	35.1	54.7	70.3	61.8	0.0	0.0	0.0
McAllen CSA	28	341	1.8	151	0.8	0.0	1.3	18.4	21.4	19.9	38.1	39.3	47.0	41.7	39.3	29.8	1.0	0.0	2.0
Midland CSA	19	154	1.2	57	0.6	0.0	1.8	16.6	10.5	10.5	29.5	10.5	28.1	52.9	78.9	59.6	0.3	0.0	0.0
San Antonio CSA	108	1,129	6.8	291	2.2	0.9	0.7	15.0	1.9	9.6	29.0	15.7	30.2	53.7	81.5	59.5	0.1	0.0	0.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Tyler CSA	28	229	1.8	210	1.8	0.0	0.5	15.3	10.7	13.8	43.7	71.4	58.1	39.2	17.9	27.6	0.0	0.0	0.0		
Waco MSA	23	204	1.4	98	2.4	0.0	0.0	14.5	4.3	4.1	36.9	60.9	48.0	46.2	34.8	48.0	0.0	0.0	0.0		
Wichita Falls MSA	7	40	0.4	41	4.4	0.0	7.3	24.1	0.0	7.3	16.1	0.0	17.1	55.4	100.0	68.3	0.0	0.0	0.0		
Non-MSA TX	24	208	1.5	118	0.0	0.0	0.0	12.0	8.3	5.1	33.8	33.3	42.4	54.2	58.3	52.5	0.0	0.0	0.0		
Total	1,595	18,868	100.0	5,822	3.7	1.9	1.1	15.5	8.8	11.4	33.6	32.7	40.0	47.0	56.3	47.4	0.2	0.4	0.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Dallas CSA	896	10,361	30.1	1,632	3.2	1.9	1.3	16.8	10.2	10.5	35.4	40.5	50.2	44.1	47.2	37.9	0.5	0.2	0.1
Houston MSA	915	10,587	30.7	1,074	5.8	2.2	2.4	17.4	11.3	15.6	30.2	33.6	36.3	45.1	51.8	43.9	1.5	1.2	1.7
Limited-Scope:																			
Abilene MSA	17	146	0.6	122	2.7	0.0	0.0	13.3	0.0	4.9	28.2	11.8	24.6	55.2	88.2	70.5	0.5	0.0	0.0
Amarillo CSA	73	772	2.5	292	3.5	0.0	1.0	15.1	11.0	7.5	18.1	6.8	10.3	63.3	82.2	81.2	0.0	0.0	0.0
Austin MSA	327	2,861	11.0	422	2.1	1.2	0.7	17.3	15.6	21.1	35.3	33.9	40.0	41.9	48.9	37.4	3.3	0.3	0.7
Beaumont MSA	23	277	0.8	74	2.0	0.0	4.1	19.7	8.7	1.4	20.5	26.1	12.2	54.1	56.5	79.7	3.7	8.7	2.7
Brownsville CSA	33	441	1.1	114	1.7	0.0	0.9	17.9	9.1	19.3	40.5	39.4	28.9	39.4	51.5	50.9	0.5	0.0	0.0
College Station MSA	61	590	2.0	90	3.6	3.3	1.1	10.5	13.1	4.4	28.9	27.9	38.9	55.8	55.7	54.4	1.1	0.0	1.1
El Paso CSA	29	360	1.0	50	1.9	0.0	0.0	29.5	31.0	28.0	25.8	17.2	24.0	42.5	51.7	48.0	0.2	0.0	0.0
Killeen MSA	20	242	0.7	129	5.0	0.0	1.6	18.9	0.0	3.9	31.5	30.0	42.6	44.0	70.0	51.9	0.7	0.0	0.0
Laredo MSA	10	119	0.3	65	3.7	0.0	1.5	26.8	30.0	27.7	11.0	0.0	18.5	58.3	70.0	52.3	0.3	0.0	0.0
Longview MSA	10	80	0.3	75	0.0	0.0	0.0	19.2	0.0	12.0	55.8	70.0	61.3	24.9	30.0	26.7	0.2	0.0	0.0
Lubbock CSA	80	1,071	2.7	388	2.0	1.3	0.3	11.2	7.5	9.8	40.0	42.5	46.1	46.1	48.8	43.6	0.8	0.0	0.3
McAllen CSA	77	880	2.6	154	2.1	0.0	1.3	15.4	15.6	17.5	39.1	39.0	40.9	41.0	42.9	37.7	2.4	2.6	2.6

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Midland CSA	52	560	1.7	61	0.8	1.9	0.0	23.4	15.4	16.4	28.8	34.6	29.5	46.0	48.1	54.1	1.1	0.0	0.0
San Antonio CSA	186	1,693	6.2	232	3.3	1.6	1.7	16.7	11.3	11.2	28.8	22.0	38.8	50.3	64.5	47.8	0.9	0.5	0.4
Tyler CSA	47	452	1.6	159	0.7	0.0	0.0	18.6	27.7	26.4	46.9	53.2	34.6	32.3	12.8	37.1	1.4	6.4	1.9
Waco MSA	55	500	1.8	117	4.7	9.1	3.4	14.1	0.0	2.6	38.5	49.1	44.4	42.6	41.8	49.6	0.1	0.0	0.0
Wichita Falls MSA	5	47	0.2	23	6.4	0.0	4.3	20.6	0.0	4.3	58.6	100.0	82.6	14.5	0.0	8.7	0.0	0.0	0.0
Non-MSA TX	61	809	2.0	100	0.0	0.0	0.0	5.7	1.6	3.0	43.1	42.6	50.0	51.2	55.7	47.0	0.0	0.0	0.0
Total	2,977	32,848	100.0	5,373	3.5	1.8	1.4	17.0	11.4	12.6	33.4	35.2	40.3	44.8	50.9	45.0	1.2	0.7	0.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Dallas CSA	488	6,232	30.6	1,714	96.4	74.0	56.0	1.9	6.8	1.8	19.3
Houston MSA	449	5,380	28.2	1,009	95.7	71.7	57.0	2.2	9.6	2.1	18.7
Limited-Scope:											
Abilene MSA	10	110	0.6	132	97.2	50.0	56.8	2.3	40.0	0.5	10.0
Amarillo CSA	45	551	2.8	423	95.1	53.3	58.6	3.7	22.2	1.2	24.4
Austin MSA	199	2,449	12.5	434	97.1	73.4	55.1	1.6	9.0	1.3	17.6
Beaumont MSA	15	232	0.9	80	98.7	100.0	68.8	1.0	0.0	0.3	0.0
Brownsville CSA	26	265	1.6	94	95.9	61.5	45.7	2.3	11.5	1.8	26.9
College Station MSA	17	113	1.1	99	95.5	82.4	64.6	1.0	5.9	3.5	11.8
El Paso CSA	14	274	0.9	39	93.8	35.7	46.2	4.0	21.4	2.2	42.9
Killeen MSA	8	61	0.5	105	97.7	87.5	37.1	1.3	0.0	1.0	12.5
Laredo MSA	6	66	0.4	73	96.2	66.7	79.5	2.5	33.3	1.3	0.0
Longview MSA	7	68	0.4	112	97.5	57.1	59.8	1.7	0.0	0.7	42.9
Lubbock CSA	74	762	4.6	542	97.1	67.6	44.1	2.1	20.3	0.8	12.2
McAllen CSA	28	341	1.8	151	93.2	82.1	36.4	4.0	10.7	2.7	7.1
Midland CSA	19	154	1.2	57	98.6	63.2	64.9	0.5	5.3	0.9	31.6
San Antonio CSA	108	1,129	6.8	291	96.3	77.8	54.3	1.7	7.4	2.0	14.8
Tyler CSA	28	229	1.8	210	96.6	75.0	72.9	1.8	14.3	1.6	10.7
Waco MSA	23	204	1.4	98	97.6	73.9	44.9	1.2	4.3	1.2	21.7
Wichita Falls MSA	7	40	0.4	41	95.6	100.0	58.5	2.8	0.0	1.6	0.0
Non-MSA TX	24	208	1.5	118	98.6	70.8	67.8	0.5	8.3	0.9	20.8
Total	1,595	18,868	100.0	5,822	96.3	72.4	55.5	1.9	9.5	1.7	18.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Dallas CSA	896	10,361	30.1	1,632	97.5	76.7	61.8	1.2	7.9	1.4	15.4
Houston MSA	915	10,587	30.7	1,074	97.3	78.4	63.2	1.2	8.7	1.5	12.9
Limited-Scope:											
Abilene MSA	17	146	0.6	122	98.0	82.4	70.5	1.6	5.9	0.4	11.8
Amarillo CSA	73	772	2.5	292	96.4	60.3	55.8	2.6	20.5	1.0	19.2
Austin MSA	327	2,861	11.0	422	98.1	77.7	62.8	0.8	4.3	1.0	18.0
Beaumont MSA	23	277	0.8	74	98.6	73.9	63.5	0.8	0.0	0.6	26.1
Brownsville CSA	33	441	1.1	114	97.0	48.5	47.4	1.6	39.4	1.4	12.1
College Station MSA	61	590	2.0	90	96.2	68.9	53.3	0.7	6.6	3.1	24.6
El Paso CSA	29	360	1.0	50	95.7	44.8	42.0	2.6	48.3	1.7	6.9
Killeen MSA	20	242	0.7	129	97.7	95.0	43.4	1.1	0.0	1.3	5.0
Laredo MSA	10	119	0.3	65	97.6	70.0	90.8	1.6	30.0	0.8	0.0
Longview MSA	10	80	0.3	75	98.0	80.0	62.7	1.2	0.0	0.7	20.0
Lubbock CSA	80	1,071	2.7	388	97.4	68.8	53.9	1.6	16.3	1.0	15.0
McAllen CSA	77	880	2.6	154	95.2	67.5	47.4	2.7	27.3	2.1	5.2
Midland CSA	52	560	1.7	61	99.1	88.5	72.1	0.3	5.8	0.6	5.8
San Antonio CSA	186	1,693	6.2	232	97.2	73.1	64.7	1.1	7.0	1.7	19.9
Tyler CSA	47	452	1.6	159	97.8	72.3	71.7	1.1	12.8	1.2	14.9
Waco MSA	55	500	1.8	117	98.2	72.7	43.6	0.9	5.5	0.9	21.8
Wichita Falls MSA	5	47	0.2	23	96.8	100.0	52.2	2.0	0.0	1.2	0.0
Non-MSA TX	61	809	2.0	100	98.8	72.1	80.0	0.4	9.8	0.9	18.0
Total	2,977	32,848	100.0	5,373	97.5	75.6	60.8	1.2	9.4	1.3	15.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Salt Lake City CSA	6,649	3,008,921	90.4	221,337	1.3	1.1	1.2	15.0	11.3	12.6	47.1	40.8	49.7	36.4	46.5	36.3	0.3	0.3	0.2	
Limited-Scope:																				
Logan MSA	173	47,660	2.4	9,629	1.5	1.7	1.9	12.7	13.3	12.3	47.3	38.7	48.9	38.6	46.2	36.9	0.0	0.0	0.0	
St. George MSA	530	194,222	7.2	20,260	0.0	0.0	0.0	5.5	3.2	3.9	82.1	86.8	84.9	12.4	10.0	11.2	0.0	0.0	0.0	
Total	7,352	3,250,803	100.0	251,226	1.2	1.1	1.2	14.3	10.8	11.9	49.3	44.1	52.5	35.0	43.8	34.3	0.2	0.3	0.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Salt Lake City CSA	1,957	1,296,032	89.0	114,899	0.6	1.0	0.7	14.2	13.0	13.0	50.9	38.3	51.1	34.3	47.7	35.2	0.0	0.0	0.0	
Limited-Scope:																				
Logan MSA	69	25,145	3.1	5,295	1.0	1.4	1.7	9.2	13.0	9.4	46.3	42.0	48.0	42.3	43.5	40.2	1.2	0.0	0.7	
St. George MSA	174	93,621	7.9	11,276	0.0	0.0	0.0	12.3	12.6	11.1	68.3	54.0	58.6	19.4	33.3	30.3	0.0	0.0	0.0	
Total	2,200	1,414,798	100.0	131,470	0.6	0.9	0.7	13.9	13.0	12.7	51.9	39.6	51.6	33.6	46.5	35.0	0.1	0.0	0.0	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Salt Lake City CSA	6,649	3,008,921	90.4	221,337	18.9	5.3	5.8	17.8	21.1	19.9	22.5	20.9	24.9	40.8	48.2	35.1	0.0	4.5	14.4	
Limited-Scope:																				
Logan MSA	173	47,660	2.4	9,629	19.4	4.0	3.2	18.5	22.0	15.5	22.5	27.2	23.8	39.5	44.5	40.2	0.0	2.3	17.3	
St. George MSA	530	194,222	7.2	20,260	17.7	3.6	3.3	19.6	13.6	12.2	23.3	19.4	20.0	39.3	60.8	43.6	0.0	2.6	20.9	
Total	7,352	3,250,803	100.0	251,226	18.8	5.1	5.5	18.0	20.6	19.1	22.5	21.0	24.4	40.7	49.0	36.0	0.0	4.3	15.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Salt Lake City CSA	1,957	1,296,032	89.0	114,899	17.1	5.8	5.9	18.8	17.9	18.1	23.9	18.8	26.2	40.2	50.1	37.9	0.0	7.4	11.8	
Limited-Scope:																				
Logan MSA	69	25,145	3.1	5,295	20.0	4.3	3.4	17.9	15.9	12.4	21.9	26.1	24.9	40.1	52.2	46.9	0.0	1.4	12.5	
St. George MSA	174	93,621	7.9	11,276	18.1	3.4	5.0	20.3	18.4	13.2	21.2	18.4	19.6	40.3	50.6	44.5	0.0	9.2	17.6	
Total	2,200	1,414,798	100.0	131,470	17.3	5.5	5.8	18.9	17.9	17.5	23.6	19.0	25.6	40.2	50.2	38.9	0.0	7.3	12.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate	% Businesses	% Bank Loan s	Aggregate		
Full-Scope:																					
Salt Lake City CSA	16,939	471,924	89.8	63,902	3.5	3.1	3.3	16.3	13.9	15.8	40.9	40.0	42.0	38.9	42.5	38.6	0.4	0.4	0.4		
Limited-Scope:																					
Logan MSA	628	10,618	3.3	3,150	6.3	6.5	4.8	19.3	15.8	18.4	39.6	37.3	42.8	34.8	40.4	34.0	0.0	0.0	0.0		
St. George MSA	1,297	18,181	6.9	6,158	0.0	0.0	0.0	6.5	5.6	5.0	82.0	81.3	84.0	11.6	13.1	11.0	0.0	0.0	0.0		
Total	18,864	500,723	100.0	73,210	3.3	3.0	3.1	15.7	13.4	15.0	43.8	42.7	45.5	36.7	40.4	36.1	0.4	0.4	0.4		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Salt Lake City CSA	28,978	448,551	88.3	64,971	2.2	1.6	2.1	13.4	9.9	13.8	46.8	44.6	46.6	37.1	43.8	37.1	0.5	0.2	0.4		
Limited-Scope:																					
Logan MSA	1,336	15,791	4.1	2,969	6.2	3.9	4.3	15.9	13.0	16.1	38.2	40.4	43.4	38.8	41.8	35.5	0.9	0.8	0.7		
St. George MSA	2,510	31,777	7.6	5,718	0.0	0.0	0.0	12.8	9.7	11.9	63.2	52.8	60.7	24.0	37.5	27.4	0.0	0.0	0.0		
Total	32,824	496,119	100.0	73,658	2.2	1.6	2.0	13.5	10.0	13.7	47.7	45.0	47.6	36.2	43.2	36.3	0.5	0.2	0.4		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Salt Lake City CSA	16,939	471,924	89.8	63,902	88.9	65.0	45.2	3.4	17.0	7.8	18.0
Limited-Scope:											
Logan MSA	628	10,618	3.3	3,150	86.8	72.0	51.2	3.3	16.1	9.9	11.9
St. George MSA	1,297	18,181	6.9	6,158	89.6	71.5	52.2	2.4	14.3	8.0	14.3
Total	18,864	500,723	100.0	73,210	88.8	65.7	46.1	3.3	16.8	7.9	17.5
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Salt Lake City CSA	28,978	448,551	88.3	64,971	93.1	73.9	44.9	2.0	14.7	4.9	11.4
Limited-Scope:											
Logan MSA	1,336	15,791	4.1	2,969	91.8	73.1	47.3	2.0	13.4	6.3	13.5
St. George MSA	2,510	31,777	7.6	5,718	93.7	74.8	48.6	1.4	13.9	4.9	11.2
Total	32,824	496,119	100.0	73,658	93.1	73.9	45.3	1.9	14.6	5.0	11.5
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Salt Lake City CSA	100	1,185	79.4	299	2.3	0.0	0.7	13.6	13.0	8.4	45.1	40.0	50.8	38.9	47.0	40.1	0.2	0.0	0.0	
Limited-Scope:																				
Logan MSA	18	129	14.3	197	1.8	0.0	0.0	7.2	0.0	3.6	61.3	66.7	74.1	29.7	33.3	22.3	0.0	0.0	0.0	
St. George MSA	8	127	6.3	41	0.0	0.0	0.0	9.5	0.0	2.4	78.2	75.0	75.6	12.3	25.0	22.0	0.0	0.0	0.0	
Total	126	1,441	100.0	537	2.0	0.0	0.4	12.7	10.3	6.1	49.4	46.0	61.3	35.8	43.7	32.2	0.2	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Salt Lake City CSA	271	2,541	75.7	320	1.3	0.4	0.3	13.4	3.0	7.2	48.7	42.8	48.8	36.4	53.1	43.4	0.1	0.7	0.3		
Limited-Scope:																					
Logan MSA	50	591	14.0	141	2.2	2.0	1.4	7.1	2.0	2.8	55.3	72.0	68.1	34.8	24.0	27.7	0.5	0.0	0.0		
St. George MSA	37	322	10.3	42	0.0	0.0	0.0	12.7	10.8	7.1	69.4	59.5	76.2	18.0	29.7	16.7	0.0	0.0	0.0		
Total	358	3,454	100.0	503	1.2	0.6	0.6	12.8	3.6	6.0	51.1	48.6	56.5	34.7	46.6	36.8	0.2	0.6	0.2		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Salt Lake City CSA	100	1,185	79.4	299	97.2	81.0	58.2	1.7	6.0	1.1	13.0
Limited-Scope:											
Logan MSA	18	129	14.3	197	97.0	72.2	73.6	2.2	16.7	0.8	11.1
St. George MSA	8	127	6.3	41	98.1	62.5	61.0	1.1	0.0	0.8	37.5
Total	126	1,441	100.0	537	97.3	78.6	64.1	1.7	7.1	1.1	14.3
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Salt Lake City CSA	271	2,541	75.7	320	98.1	74.5	58.8	1.1	8.9	0.8	16.6
Limited-Scope:											
Logan MSA	50	591	14.0	141	97.3	56.0	66.7	1.8	36.0	0.9	8.0
St. George MSA	37	322	10.3	42	98.7	78.4	71.4	0.7	2.7	0.6	18.9
Total	358	3,454	100.0	503	98.1	72.3	62.0	1.1	12.0	0.8	15.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Burlington CSA	145	52,706	100.0	8,299	1.4	0.7	1.8	8.7	9.7	10.4	61.8	54.5	59.1	28.2	35.2	28.7	0.0	0.0	0.0	
Total	145	52,706	100.0	8,299	1.4	0.7	1.8	8.7	9.7	10.4	61.8	54.5	59.1	28.2	35.2	28.7	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Burlington CSA	47	43,435	100.0	4,743	1.5	0.0	2.0	8.9	8.5	11.3	65.5	46.8	61.2	23.8	44.7	25.0	0.3	0.0	0.5	
Total	47	43,435	100.0	4,743	1.5	0.0	2.0	8.9	8.5	11.3	65.5	46.8	61.2	23.8	44.7	25.0	0.3	0.0	0.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Burlington CSA	145	52,706	100.0	8,299	19.2	2.1	5.8	16.3	15.9	19.3	22.6	16.6	23.8	41.9	57.9	41.8	0.0	7.6	9.2
Total	145	52,706	100.0	8,299	19.2	2.1	5.8	16.3	15.9	19.3	22.6	16.6	23.8	41.9	57.9	41.8	0.0	7.6	9.2
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Burlington CSA	47	43,435	100.0	4,743	18.2	4.3	7.7	16.4	8.5	20.7	22.6	23.4	24.4	42.8	55.3	39.6	0.0	8.5	7.6
Total	47	43,435	100.0	4,743	18.2	4.3	7.7	16.4	8.5	20.7	22.6	23.4	24.4	42.8	55.3	39.6	0.0	8.5	7.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Burlington CSA	663	7,827	100.0	4,742	1.1	0.8	1.3	22.5	20.1	21.2	49.6	53.1	49.2	26.6	26.1	28.2	0.2	0.0	0.2		
Total	663	7,827	100.0	4,742	1.1	0.8	1.3	22.5	20.1	21.2	49.6	53.1	49.2	26.6	26.1	28.2	0.2	0.0	0.2		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Burlington CSA	1,492	17,623	100.0	4,367	2.1	2.4	1.9	14.8	15.3	16.5	45.2	47.7	48.8	36.5	34.1	31.9	1.5	0.5	1.0	
Total	1,492	17,623	100.0	4,367	2.1	2.4	1.9	14.8	15.3	16.5	45.2	47.7	48.8	36.5	34.1	31.9	1.5	0.5	1.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Burlington CSA	663	7,827	100.0	4,742	88.6	70.6	43.1	4.2	17.3	7.2	12.1
Total	663	7,827	100.0	4,742	88.6	70.6	43.1	4.2	17.3	7.2	12.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Burlington CSA	1,492	17,623	100.0	4,367	91.1	70.6	47.3	3.0	17.8	5.9	11.7
Total	1,492	17,623	100.0	4,367	91.1	70.6	47.3	3.0	17.8	5.9	11.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Burlington CSA	12	127	100.0	34	0.8	0.0	2.9	6.6	25.0	11.8	60.5	50.0	52.9	32.1	25.0	32.4	0.0	0.0	0.0
Total	12	127	100.0	34	0.8	0.0	2.9	6.6	25.0	11.8	60.5	50.0	52.9	32.1	25.0	32.4	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Burlington CSA	17	151	100.0	21	1.9	0.0	0.0	6.6	0.0	14.3	56.8	94.1	61.9	34.2	5.9	23.8	0.4	0.0	0.0
Total	17	151	100.0	21	1.9	0.0	0.0	6.6	0.0	14.3	56.8	94.1	61.9	34.2	5.9	23.8	0.4	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Burlington CSA	12	127	100.0	34	98.2	75.0	47.1	0.5	8.3	1.2	16.7
Total	12	127	100.0	34	98.2	75.0	47.1	0.5	8.3	1.2	16.7
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Full-Scope:												
Burlington CSA	17	151	100.0	21	98.3	58.8	52.4	0.6	0.0	1.1	41.2	
Total	17	151	100.0	21	98.3	58.8	52.4	0.6	0.0	1.1	41.2	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Richmond MSA	1,780	515,337	63.3	75,871	4.5	2.6	4.1	15.8	9.5	13.8	38.1	29.4	34.8	41.5	58.5	47.3	0.0	0.0	0.0	
Limited-Scope:																				
Charlottesville MSA	280	122,643	10.0	8,904	4.1	5.7	4.5	14.3	11.1	11.9	41.2	32.5	39.3	40.3	50.7	44.3	0.0	0.0	0.0	
Virginia Beach CSA	753	242,355	26.8	65,152	3.0	1.2	2.7	19.2	11.0	19.3	34.5	27.0	34.7	43.1	60.4	43.0	0.2	0.4	0.3	
Total	2,813	880,335	100.0	149,927	3.9	2.6	3.5	17.2	10.1	16.1	36.8	29.0	35.0	42.1	58.2	45.2	0.1	0.1	0.1	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Richmond MSA	891	262,557	67.2	38,928	3.3	5.5	3.8	14.7	25.8	17.6	43.4	38.0	40.4	38.1	30.5	37.8	0.5	0.1	0.4	
Limited-Scope:																				
Charlottesville MSA	133	71,825	10.0	4,738	0.8	2.3	1.2	7.8	10.5	6.6	43.3	31.6	40.7	48.1	55.6	51.5	0.0	0.0	0.0	
Virginia Beach CSA	301	111,456	22.7	34,794	3.0	2.3	3.8	17.0	18.6	20.6	38.8	32.9	39.0	41.0	45.5	36.3	0.3	0.7	0.4	
Total	1,325	445,838	100.0	78,460	3.0	4.5	3.6	15.2	22.6	18.3	41.4	36.2	39.8	40.0	36.5	37.9	0.4	0.2	0.4	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Richmond MSA	1,780	515,337	63.3	75,871	20.1	5.1	6.8	17.4	14.8	19.0	19.9	22.3	20.6	42.7	54.0	34.8	0.0	3.8	18.8
Limited-Scope:																			
Charlottesville MSA	280	122,643	10.0	8,904	19.0	5.4	5.3	15.0	9.3	15.2	18.8	20.0	18.2	47.2	58.6	44.9	0.0	6.8	16.3
Virginia Beach CSA	753	242,355	26.8	65,152	22.2	4.1	4.3	18.0	12.0	16.2	20.1	19.3	18.6	39.7	56.2	29.1	0.0	8.5	31.8
Total	2,813	880,335	100.0	149,927	21.0	4.9	5.6	17.5	13.5	17.5	19.9	21.3	19.6	41.6	55.0	32.9	0.0	5.3	24.3
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Richmond MSA	891	262,557	67.2	38,928	19.9	13.2	9.0	17.9	30.4	21.4	20.3	21.0	21.4	41.8	32.8	31.7	0.0	2.6	16.5	
Limited-Scope:																				
Charlottesville MSA	133	71,825	10.0	4,738	19.1	15.8	7.6	15.5	19.5	15.4	20.7	15.0	19.2	44.7	45.9	42.4	0.0	3.8	15.4	
Virginia Beach CSA	301	111,456	22.7	34,794	20.9	8.6	6.0	18.5	17.3	21.8	21.3	18.9	22.2	39.2	47.5	28.8	0.0	7.6	21.2	
Total	1,325	445,838	100.0	78,460	20.3	12.5	7.6	18.0	26.3	21.2	20.8	19.9	21.6	40.8	37.4	31.0	0.0	3.8	18.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Richmond MSA	2,747	32,600	54.1	28,461	6.7	4.6	5.4	21.3	15.7	19.3	31.9	29.7	32.8	39.8	49.8	42.3	0.3	0.2	0.2		
Limited-Scope:																					
Charlottesville MSA	573	6,376	11.3	4,447	4.7	7.3	5.8	15.8	12.6	15.4	34.3	32.8	34.7	45.1	47.1	44.2	0.1	0.2	0.0		
Virginia Beach CSA	1,753	21,396	34.6	21,073	4.0	1.8	3.4	26.1	20.3	24.5	31.7	29.2	32.2	37.0	47.3	38.0	1.2	1.4	1.9		
Total	5,073	60,372	100.0	53,981	5.4	3.9	4.6	22.8	16.9	21.0	32.0	29.9	32.7	39.1	48.7	40.8	0.7	0.6	0.9		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Richmond MSA	6,927	84,724	56.1	26,506	5.7	2.8	4.5	17.9	14.0	17.1	38.1	32.9	39.8	36.6	49.2	37.3	1.6	1.2	1.2		
Limited-Scope:																					
Charlottesville MSA	1,312	14,994	10.6	4,088	2.7	2.6	2.6	11.1	6.7	9.1	37.8	34.8	43.3	48.4	55.9	45.0	0.0	0.0	0.0		
Virginia Beach CSA	4,102	50,450	33.2	19,383	4.8	1.9	3.6	28.2	18.2	24.2	32.4	32.6	35.2	33.3	46.2	34.6	1.4	1.2	2.4		
Total	12,341	150,168	100.0	49,977	5.1	2.4	4.0	21.7	14.6	19.2	35.7	33.0	38.3	36.1	48.9	36.9	1.4	1.0	1.6		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Richmond MSA	2,747	32,600	54.1	28,461	89.1	73.5	49.2	3.2	15.0	7.7	11.5
Limited-Scope:											
Charlottesville MSA	573	6,376	11.3	4,447	87.4	72.4	52.7	3.7	14.5	9.0	13.1
Virginia Beach CSA	1,753	21,396	34.6	21,073	88.9	68.7	45.3	3.0	18.5	8.1	12.7
Total	5,073	60,372	100.0	53,981	88.9	71.8	48.0	3.1	16.1	8.0	12.1
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Richmond MSA	6,927	84,724	56.1	26,506	92.3	76.6	51.4	2.2	13.7	5.5	9.7
Limited-Scope:											
Charlottesville MSA	1,312	14,994	10.6	4,088	90.4	73.4	56.1	2.6	12.4	6.9	14.2
Virginia Beach CSA	4,102	50,450	33.2	19,383	92.1	74.5	49.9	2.0	14.6	5.9	10.9
Total	12,341	150,168	100.0	49,977	92.1	75.5	51.2	2.1	13.9	5.8	10.6
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Richmond MSA	25	245	47.2	127	3.4	0.0	0.0	15.5	16.0	6.3	38.9	44.0	48.0	42.1	40.0	45.7	0.0	0.0	0.0
Limited-Scope:																			
Charlottesville MSA	20	215	37.7	55	2.1	0.0	0.0	13.1	10.0	18.2	48.7	45.0	49.1	36.1	45.0	32.7	0.0	0.0	0.0
Virginia Beach CSA	8	50	15.1	63	2.6	0.0	0.0	19.9	0.0	12.7	31.9	0.0	14.3	45.1	100.0	73.0	0.6	0.0	0.0
Total	53	510	100.0	245	2.9	0.0	0.0	16.9	11.3	10.6	37.5	37.7	39.6	42.5	50.9	49.8	0.2	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Richmond MSA	56	578	49.6	97	3.3	0.0	2.1	14.8	10.7	6.2	41.7	46.4	48.5	39.4	42.9	43.3	0.8	0.0	0.0
Limited-Scope:																			
Charlottesville MSA	28	282	24.8	56	0.8	0.0	0.0	4.3	0.0	3.6	44.6	39.3	39.3	50.3	60.7	57.1	0.0	0.0	0.0
Virginia Beach CSA	29	366	25.7	54	3.2	3.4	1.9	23.6	6.9	9.3	37.6	51.7	64.8	34.9	37.9	24.1	0.7	0.0	0.0
Total	113	1,226	100.0	207	2.9	0.9	1.4	16.7	7.1	6.3	40.6	46.0	50.2	39.1	46.0	42.0	0.6	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Richmond MSA	25	245	47.2	127	96.7	76.0	56.7	1.6	4.0	1.6	20.0
Limited-Scope:											
Charlottesville MSA	20	215	37.7	55	98.2	75.0	60.0	0.8	5.0	1.0	20.0
Virginia Beach CSA	8	50	15.1	63	97.2	100.0	57.1	1.3	0.0	1.6	0.0
Total	53	510	100.0	245	97.1	79.2	57.6	1.4	3.8	1.5	17.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Richmond MSA	56	578	49.6	97	97.5	75.0	53.6	1.0	7.1	1.4	17.9
Limited-Scope:											
Charlottesville MSA	28	282	24.8	56	98.5	85.7	64.3	0.8	3.6	0.7	10.7
Virginia Beach CSA	29	366	25.7	54	97.8	82.8	63.0	0.9	6.9	1.3	10.3
Total	113	1,226	100.0	207	97.8	79.6	58.9	1.0	6.2	1.3	14.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Seattle CSA	19,461	11,599,800	83.4	374,462	2.2	1.9	2.0	16.7	15.5	16.8	48.5	39.2	48.7	32.6	43.3	32.5	0.0	0.0	0.0
Limited-Scope:																			
Bellingham CSA	508	242,664	2.2	14,900	1.0	1.8	1.2	4.1	4.3	4.5	77.8	76.0	80.3	17.0	17.5	13.9	0.1	0.4	0.2
Kennewick CSA	668	165,318	2.9	22,484	1.7	1.0	1.4	22.1	16.5	19.1	40.7	31.0	38.3	35.5	51.5	41.1	0.0	0.0	0.0
Spokane MSA	1,311	345,580	5.6	41,045	0.1	0.2	0.1	20.7	18.1	22.3	47.5	39.0	44.3	31.4	42.5	32.9	0.3	0.3	0.4
Wenatchee MSA	265	109,582	1.1	7,620	0.0	0.0	0.0	12.3	8.7	12.9	78.4	83.8	78.7	9.3	7.5	8.3	0.0	0.0	0.0
Yakima MSA	323	67,904	1.4	9,982	0.0	0.0	0.0	17.6	10.8	12.7	41.2	35.3	40.2	41.3	53.9	47.1	0.0	0.0	0.0
Non-MSA WA	799	257,519	3.4	23,502	0.5	0.8	0.8	11.2	4.5	8.1	71.8	78.2	73.5	16.5	16.5	17.5	0.0	0.0	0.0
Total	23,335	12,788,367	100.0	493,995	1.7	1.7	1.6	16.5	14.9	16.4	50.9	41.6	50.3	30.9	41.8	31.6	0.0	0.0	0.1
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Seattle CSA	5,627	4,944,923	80.9	175,211	1.8	2.1	1.8	17.2	16.8	17.8	47.7	37.8	48.5	33.0	42.4	31.5	0.3	0.8	0.3	
Limited-Scope:																				
Bellingham CSA	185	119,220	2.7	6,867	0.1	0.0	0.1	14.6	15.7	16.5	54.9	53.0	56.8	29.2	31.4	25.4	1.2	0.0	1.1	
Kennewick CSA	188	64,287	2.7	12,287	0.8	0.5	0.8	20.5	19.7	18.4	44.1	29.8	42.2	34.4	50.0	38.4	0.2	0.0	0.2	
Spokane MSA	434	132,008	6.2	21,607	1.7	4.1	2.4	18.6	23.5	21.6	49.1	42.6	46.1	30.6	29.5	29.8	0.1	0.2	0.1	
Wenatchee MSA	96	49,105	1.4	4,001	0.0	0.0	0.0	12.1	17.7	12.2	60.8	51.0	60.6	27.2	31.3	27.3	0.0	0.0	0.0	
Yakima MSA	126	26,559	1.8	5,748	0.2	1.6	0.3	16.2	18.3	16.2	35.5	32.5	30.3	48.1	47.6	53.3	0.0	0.0	0.0	
Non-MSA WA	300	123,136	4.3	13,323	0.2	1.0	0.2	20.8	17.3	20.9	55.6	49.3	53.9	23.0	32.0	24.3	0.5	0.3	0.6	
Total	6,956	5,459,238	100.0	239,044	1.5	2.1	1.6	17.5	17.4	18.2	48.2	38.9	48.3	32.5	41.0	31.6	0.3	0.7	0.3	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Seattle CSA	19,461	11,599,800	83.4	374,462	20.8	4.9	4.6	17.7	16.0	15.2	21.1	19.5	23.1	40.4	53.5	42.0	0.0	6.1	15.2	
Limited-Scope:																				
Bellingham CSA	508	242,664	2.2	14,900	20.8	4.9	3.2	17.1	14.6	13.3	22.5	18.7	22.9	39.6	56.1	47.8	0.0	5.7	12.7	
Kennewick CSA	668	165,318	2.9	22,484	21.6	7.8	4.7	17.2	17.5	15.6	19.9	24.0	24.3	41.2	46.1	40.0	0.0	4.6	15.3	
Spokane MSA	1,311	345,580	5.6	41,045	20.7	7.3	4.8	17.1	16.9	15.8	22.1	24.9	22.7	40.1	47.2	40.2	0.0	3.7	16.6	
Wenatchee MSA	265	109,582	1.1	7,620	19.1	3.8	2.7	19.1	11.7	10.0	22.3	17.7	21.2	39.6	65.7	53.2	0.0	1.1	12.9	
Yakima MSA	323	67,904	1.4	9,982	20.2	4.0	3.0	18.1	16.7	12.7	20.6	24.1	23.2	41.1	49.8	46.1	0.0	5.3	15.0	
Non-MSA WA	799	257,519	3.4	23,502	20.1	4.0	3.6	18.9	13.0	12.4	22.0	18.1	21.6	39.1	60.3	47.7	0.0	4.5	14.6	
Total	23,335	12,788,367	100.0	493,995	20.7	5.1	4.4	17.7	15.9	14.9	21.2	19.9	23.0	40.3	53.3	42.5	0.0	5.8	15.2	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Seattle CSA	5,627	11,599,800	80.9	175,211	20.0	5.6	5.5	17.9	13.3	15.3	22.0	18.6	24.7	40.1	52.9	42.5	0.0	9.7	12.0
Limited-Scope:																			
Bellingham CSA	185	242,664	2.7	6,867	19.0	8.1	5.3	18.9	16.8	14.6	23.2	18.9	24.2	38.9	48.6	45.5	0.0	7.6	10.4
Kennewick CSA	188	165,318	2.7	12,287	19.9	6.4	4.7	18.3	17.0	16.0	20.6	28.2	26.3	41.2	44.1	42.2	0.0	4.3	10.9
Spokane MSA	434	345,580	6.2	21,607	19.6	7.8	5.7	18.6	21.4	17.6	21.5	25.3	23.7	40.3	41.2	40.6	0.0	4.1	12.3
Wenatchee MSA	96	109,582	1.4	4,001	18.5	4.2	3.5	19.0	7.3	9.8	21.1	15.6	20.3	41.5	68.8	57.0	0.0	4.2	9.3
Yakima MSA	126	67,904	1.8	5,748	20.3	10.3	5.1	18.5	23.0	15.2	21.6	23.8	24.4	39.6	35.7	41.6	0.0	7.1	13.7
Non-MSA WA	300	257,519	4.3	13,323	21.1	6.7	5.0	19.0	15.0	15.3	21.0	18.3	22.2	38.9	54.0	45.4	0.0	6.0	12.1
Total	6,956	12,788,367	100.0	239,044	19.9	5.9	5.4	18.1	14.1	15.4	21.8	19.3	24.4	40.1	51.8	42.8	0.0	8.8	11.9
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Seattle CSA	28,292	745,041	81.9	130,139	4.8	3.9	5.4	18.0	16.6	19.5	41.2	40.4	41.6	35.4	38.8	33.2	0.6	0.3	0.3
Limited-Scope:																			
Bellingham CSA	1,064	21,699	3.1	6,187	1.7	2.2	1.3	5.3	6.3	5.7	72.3	70.7	74.2	15.3	14.6	13.8	5.4	6.3	5.0
Kennewick CSA	1,026	20,863	3.0	6,103	2.0	1.4	2.1	25.4	17.5	26.0	41.6	38.6	40.6	30.6	42.3	30.9	0.3	0.2	0.3
Spokane MSA	2,313	38,567	6.7	11,623	2.8	1.6	2.4	34.9	26.2	31.1	36.8	38.9	40.2	24.7	32.7	25.6	0.9	0.6	0.7
Wenatchee MSA	367	6,808	1.1	3,290	0.0	0.0	0.0	19.7	16.6	17.6	70.5	71.9	74.9	9.9	11.4	7.5	0.0	0.0	0.0
Yakima MSA	450	14,423	1.3	3,974	0.0	0.0	0.0	27.0	21.3	25.5	39.4	38.9	41.3	33.6	39.8	33.2	0.0	0.0	0.0
Non-MSA WA	1,045	18,358	3.0	7,428	1.2	0.8	0.7	14.9	11.9	14.1	68.4	68.3	69.5	15.5	19.0	15.7	0.0	0.0	0.0
Total	34,557	865,759	100.0	168,744	4.1	3.4	4.5	19.2	16.9	19.9	43.9	42.3	44.6	32.1	36.9	30.6	0.7	0.4	0.5
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Seattle CSA	50,014	670,828	81.6	121,219	4.2	2.8	4.5	18.8	14.5	19.7	41.4	39.5	41.7	34.6	42.0	33.2	1.0	1.1	0.9	
Limited-Scope:																				
Bellingham CSA	1,927	25,629	3.1	5,562	4.9	3.8	4.7	14.4	11.8	14.4	53.2	57.8	53.4	25.2	24.9	25.0	2.3	1.7	2.4	
Kennewick CSA	1,947	24,279	3.2	6,125	2.0	1.3	2.4	26.5	20.0	27.5	41.2	40.1	39.9	29.3	38.3	29.1	1.0	0.4	1.2	
Spokane MSA	4,110	51,784	6.7	11,246	1.1	0.9	1.1	24.9	19.5	27.1	34.9	37.9	40.5	21.8	33.6	24.4	17.3	8.1	6.9	
Wenatchee MSA	600	8,138	1.0	2,554	0.0	0.0	0.0	17.9	14.8	16.6	56.9	60.5	59.0	25.2	24.7	24.4	0.0	0.0	0.0	
Yakima MSA	816	12,183	1.3	3,466	6.1	5.5	5.7	21.4	18.5	21.8	30.4	33.9	33.0	42.1	42.0	39.4	0.0	0.0	0.0	
Non-MSA WA	1,914	24,419	3.1	7,044	0.6	0.5	0.2	24.6	20.4	23.8	52.0	50.6	51.1	22.4	28.3	24.4	0.5	0.3	0.5	
Total	61,328	817,260	100.0	157,216	3.7	2.6	3.9	19.7	15.2	20.5	41.8	40.5	42.4	32.4	40.2	31.7	2.4	1.5	1.3	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Seattle CSA	28,292	745,041	81.9	130,139	89.7	62.7	49.0	3.3	13.2	7.0	24.1
Limited-Scope:											
Bellingham CSA	1,064	21,699	3.1	6,187	90.1	66.4	45.0	3.5	12.9	6.4	20.8
Kennewick CSA	1,026	20,863	3.0	6,103	87.0	64.5	48.7	3.3	17.3	9.7	18.1
Spokane MSA	2,313	38,567	6.7	11,623	88.3	65.1	51.9	3.5	14.3	8.2	20.6
Wenatchee MSA	367	6,808	1.1	3,290	87.7	63.5	44.2	3.4	11.2	9.0	25.3
Yakima MSA	450	14,423	1.3	3,974	84.1	62.7	51.7	4.6	13.6	11.3	23.8
Non-MSA WA	1,045	18,358	3.0	7,428	86.8	64.4	52.7	3.2	12.2	10.1	23.3
Total	34,557	865,759	100.0	168,744	89.2	63.1	49.1	3.3	13.3	7.5	23.6
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Seattle CSA	50,014	670,828	81.6	121,219	92.1	76.2	54.3	2.3	11.4	5.7	12.4
Limited-Scope:											
Bellingham CSA	1,927	25,629	3.1	5,562	92.2	75.1	50.8	2.5	13.2	5.3	11.7
Kennewick CSA	1,947	24,279	3.2	6,125	89.8	71.8	52.7	2.4	15.5	7.9	12.7
Spokane MSA	4,110	51,784	6.7	11,246	91.3	73.2	54.2	2.4	14.9	6.4	11.9
Wenatchee MSA	600	8,138	1.0	2,554	90.6	73.7	55.1	2.4	14.7	7.1	11.7
Yakima MSA	816	12,183	1.3	3,466	87.4	77.5	57.6	3.3	14.7	9.3	7.8
Non-MSA WA	1,914	24,419	3.1	7,044	89.5	73.4	56.3	2.3	13.4	8.2	13.2
Total	61,328	817,260	100.0	157,216	91.7	75.8	54.2	2.3	11.9	6.0	12.3
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Seattle CSA	174	2,364	36.4	947	2.7	0.6	1.2	16.0	8.6	12.0	48.7	44.8	48.9	31.8	46.0	37.9	0.9	0.0	0.0		
Limited-Scope:																					
Bellingham CSA	26	399	5.4	216	1.0	0.0	1.4	2.3	3.8	0.0	81.1	84.6	78.2	15.0	11.5	20.4	0.5	0.0	0.0		
Kennewick CSA	55	886	11.5	425	1.2	0.0	0.2	20.1	23.6	18.1	58.9	58.2	64.0	19.6	18.2	17.6	0.2	0.0	0.0		
Spokane MSA	41	372	8.6	277	1.0	0.0	0.0	20.4	19.5	15.9	47.1	31.7	52.0	31.4	48.8	32.1	0.1	0.0	0.0		
Wenatchee MSA	15	193	3.1	205	0.0	0.0	0.0	14.1	6.7	7.8	76.3	80.0	89.8	9.6	13.3	2.4	0.0	0.0	0.0		
Yakima MSA	42	513	8.8	451	0.0	0.0	0.0	8.7	2.4	2.4	56.0	57.1	67.8	35.2	40.5	29.7	0.0	0.0	0.0		
Non-MSA WA	125	2,751	26.2	981	0.3	0.0	0.3	11.9	8.8	13.2	72.1	74.4	69.6	15.6	16.8	16.9	0.0	0.0	0.0		
Total	478	7,478	100.0	3,502	1.7	0.2	0.5	14.9	10.5	11.2	56.1	57.3	63.4	26.9	32.0	24.9	0.5	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Seattle CSA	388	3,733	42.6	817	2.5	0.3	0.2	17.8	13.1	12.4	48.9	45.6	53.2	30.3	40.5	33.9	0.4	0.5	0.2
Limited-Scope:																			
Bellingham CSA	60	687	6.6	128	0.5	0.0	0.0	10.3	8.3	9.4	60.3	46.7	60.2	27.4	45.0	29.7	1.4	0.0	0.8
Kennewick CSA	87	1,081	9.6	346	0.8	0.0	0.0	15.8	9.2	9.0	64.8	73.6	76.6	18.2	17.2	14.2	0.5	0.0	0.3
Spokane MSA	90	956	9.9	200	1.0	2.2	0.0	18.0	8.9	11.5	45.5	46.7	48.0	30.4	41.1	38.5	5.1	1.1	2.0
Wenatchee MSA	34	521	3.7	125	0.0	0.0	0.0	14.6	11.8	19.2	63.7	70.6	69.6	21.8	17.6	11.2	0.0	0.0	0.0
Yakima MSA	57	604	6.3	219	1.6	0.0	1.8	14.0	12.3	12.3	41.5	40.4	44.3	42.9	47.4	41.6	0.0	0.0	0.0
Non-MSA WA	195	2,189	21.4	731	0.1	0.0	0.0	18.2	14.4	18.3	57.9	59.5	59.9	22.7	25.1	20.2	1.1	1.0	1.5
Total	911	9,771	100.0	2,566	1.6	0.3	0.2	17.0	12.2	13.7	51.9	52.0	58.3	28.6	34.9	27.0	1.0	0.5	0.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Seattle CSA	174	2,364	36.4	947	96.4	73.0	57.4	2.0	9.8	1.7	17.2
Limited-Scope:											
Bellingham CSA	26	399	5.4	216	96.6	61.5	44.9	2.1	19.2	1.3	19.2
Kennewick CSA	55	886	11.5	425	93.7	61.8	46.4	4.0	29.1	2.3	9.1
Spokane MSA	41	372	8.6	277	96.9	78.0	57.0	1.8	2.4	1.3	19.5
Wenatchee MSA	15	193	3.1	205	93.8	73.3	62.4	3.5	20.0	2.6	6.7
Yakima MSA	42	513	8.8	451	89.8	52.4	52.3	7.7	26.2	2.5	21.4
Non-MSA WA	125	2,751	26.2	981	95.8	54.4	52.6	2.3	27.2	1.9	18.4
Total	478	7,478	100.0	3,502	95.6	64.9	53.6	2.6	18.2	1.8	16.9
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Seattle CSA	388	3,733	42.6	817	97.2	73.5	61.8	1.4	7.2	1.4	19.3
Limited-Scope:											
Bellingham CSA	60	687	6.6	128	97.6	46.7	56.3	1.4	35.0	1.0	18.3
Kennewick CSA	87	1,081	9.5	346	95.1	69.0	49.7	3.0	23.0	1.9	8.0
Spokane MSA	90	956	9.9	200	97.5	64.4	48.0	1.3	17.8	1.2	17.8
Wenatchee MSA	34	521	3.7	125	95.7	85.3	66.4	2.3	8.8	2.1	5.9
Yakima MSA	57	604	6.3	219	92.2	54.4	49.8	5.6	31.6	2.2	14.0
Non-MSA WA	195	2,189	21.4	731	96.6	59.0	52.1	1.7	22.6	1.7	18.5
Total	911	9,771	100.0	2,566	96.6	66.5	55.3	1.8	16.5	1.5	17.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Charleston CSA	636	99,322	58.3	12,454	1.7	1.7	1.2	15.6	8.5	9.9	54.4	43.6	48.6	28.3	46.2	40.2	0.0	0.0	0.1
Limited-Scope:																			
Beckley MSA	154	20,112	14.1	2,592	0.0	0.0	0.0	7.9	6.5	4.5	81.3	70.1	77.7	10.7	23.4	17.8	0.0	0.0	0.0
Morgantown CSA	150	38,222	13.7	4,267	0.0	0.0	0.2	15.3	12.7	12.5	43.2	28.7	35.6	41.4	58.7	51.7	0.0	0.0	0.0
Non-MSA WV	151	27,490	13.8	2,809	0.0	0.0	0.0	4.8	3.3	3.2	59.6	47.7	46.2	35.6	49.0	50.6	0.0	0.0	0.0
Total	1,091	185,146	100.0	22,122	1.0	1.0	0.7	12.9	8.1	8.9	58.2	45.8	49.2	27.8	45.1	41.1	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Charleston CSA	339	55,634	63.0	8,976	1.6	1.5	1.4	17.6	10.3	13.1	52.0	41.3	50.1	27.9	46.9	34.6	1.0	0.0	0.7
Limited-Scope:																			
Beckley MSA	77	10,878	14.3	1,870	0.0	0.0	0.0	12.7	13.0	12.6	67.9	58.4	62.0	19.4	28.6	25.5	0.0	0.0	0.0
Morgantown CSA	48	11,453	8.9	2,500	0.2	0.0	0.5	9.5	12.5	6.2	52.4	43.8	51.1	37.4	43.8	41.2	0.5	0.0	1.0
Non-MSA WV	74	12,240	13.8	1,941	0.0	0.0	0.0	7.3	5.4	7.1	50.7	50.0	42.5	42.0	44.6	50.5	0.0	0.0	0.0
Total	538	90,205	100.0	15,287	1.0	0.9	0.9	14.6	10.2	11.1	54.3	45.2	50.8	29.5	43.7	36.6	0.6	0.0	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Charleston CSA	636	99,322	58.3	12,454	22.3	7.4	5.7	17.2	19.2	15.7	18.9	19.7	21.3	41.6	47.5	42.6	0.0	6.3	14.7
Limited-Scope:																			
Beckley MSA	154	20,112	14.1	2,592	20.7	7.8	5.7	18.2	17.5	15.3	20.7	24.7	21.0	40.5	40.3	44.9	0.0	9.7	13.1
Morgantown CSA	150	38,222	13.7	4,267	20.9	2.0	5.3	14.4	8.7	14.4	20.4	24.7	18.5	44.2	64.0	47.9	0.0	0.7	13.9
Non-MSA WV	151	27,490	13.8	2,809	18.5	3.3	3.6	15.8	13.9	11.5	18.4	14.6	19.8	47.4	65.6	50.2	0.0	2.6	14.9
Total	1,091	185,146	100.0	22,122	21.4	6.1	5.4	16.9	16.8	14.9	19.2	20.3	20.5	42.4	51.2	44.9	0.0	5.5	14.4
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Charleston CSA	339	55,634	63.0	8,976	22.9	8.9	7.2	16.5	23.3	19.7	19.6	22.7	22.6	41.0	40.1	37.8	0.0	5.0	12.7
Limited-Scope:																			
Beckley MSA	77	10,878	14.3	1,870	25.1	11.7	8.1	15.3	26.0	19.4	18.6	22.1	22.7	41.0	37.7	37.9	0.0	2.6	11.9
Morgantown CSA	48	11,453	8.9	2,500	20.7	10.4	8.7	16.8	18.8	17.9	16.3	31.3	21.4	46.2	37.5	39.7	0.0	2.1	12.2
Non-MSA WV	74	12,240	13.8	1,941	17.0	6.8	3.9	15.4	21.6	14.5	18.0	23.0	21.3	49.7	43.2	48.8	0.0	5.4	11.5
Total	538	90,205	100.0	15,287	22.2	9.1	7.2	16.2	23.0	18.7	18.9	23.4	22.2	42.7	40.0	39.5	0.0	4.5	12.4
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Charleston CSA	1,030	35,161	56.9	6,900	6.8	7.6	7.0	12.1	10.4	10.4	50.7	45.2	50.5	30.2	36.7	31.9	0.3	0.1	0.2		
Limited-Scope:																					
Beckley MSA	296	9,768	16.4	1,785	0.0	0.0	0.0	4.3	2.0	3.7	84.7	79.7	82.0	11.0	18.2	14.3	0.0	0.0	0.0		
Morgantown CSA	242	3,718	13.4	2,104	0.3	0.4	0.2	20.4	20.2	19.1	37.2	29.8	37.5	42.1	49.6	43.2	0.0	0.0	0.0		
Non-MSA WV	241	5,580	13.3	1,758	0.0	0.0	0.0	4.3	2.1	5.3	56.7	56.8	57.9	39.0	41.1	36.8	0.0	0.0	0.0		
Total	1,809	54,227	100.0	12,547	4.0	4.4	3.9	11.4	9.2	10.2	53.6	50.4	53.9	30.8	36.0	32.0	0.2	0.1	0.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Charleston CSA	1,381	19,539	52.7	6,378	5.3	5.8	5.0	15.2	13.0	15.4	44.5	43.1	45.8	34.4	37.5	33.0	0.6	0.7	0.8		
Limited-Scope:																					
Beckley MSA	374	4,647	14.3	1,977	0.0	0.0	0.0	16.3	13.1	13.5	64.6	64.7	66.2	19.1	22.2	20.3	0.0	0.0	0.0		
Morgantown CSA	502	6,075	19.2	1,867	0.6	0.4	0.8	12.4	9.8	10.6	47.0	42.2	46.9	35.2	43.6	37.0	4.7	4.0	4.9		
Non-MSA WV	364	4,788	13.9	1,661	0.0	0.0	0.0	4.7	4.7	3.8	54.5	53.3	55.1	40.8	42.0	41.1	0.0	0.0	0.0		
Total	2,621	35,049	100.0	11,883	3.1	3.1	2.8	13.5	11.2	12.7	48.9	47.4	50.7	33.4	37.1	32.6	1.1	1.1	1.2		
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																					

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charleston CSA	1,030	35,161	56.9	6,900	80.5	53.7	45.8	5.1	20.3	14.5	26.0
Limited-Scope:											
Beckley MSA	296	9,768	16.4	1,785	80.7	62.5	47.7	4.6	14.9	14.7	22.6
Morgantown CSA	242	3,718	13.4	2,104	85.2	68.2	44.8	3.6	16.1	11.2	15.7
Non-MSA WV	241	5,580	13.3	1,758	82.3	60.6	46.9	4.8	20.7	12.9	18.7
Total	1,809	54,227	100.0	12,547	81.5	58.0	46.1	4.7	18.9	13.8	23.1
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Charleston CSA	1,381	19,539	52.7	6,378	83.8	71.0	52.5	4.0	16.1	12.3	13.0
Limited-Scope:											
Beckley MSA	374	4,647	14.3	1,977	85.0	75.7	50.8	3.4	13.4	11.6	11.0
Morgantown CSA	502	6,075	19.2	1,867	87.9	77.1	55.6	2.8	11.6	9.3	11.4
Non-MSA WV	364	4,788	13.9	1,661	85.4	74.7	54.7	3.7	13.2	10.8	12.1
Total	2,621	35,049	100.0	11,883	84.8	73.3	53.0	3.7	14.4	11.5	12.2
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Full-Scope:																					
Charleston CSA	12	98	46.2	69	3.1	0.0	1.4	11.3	8.3	17.4	53.8	66.7	55.1	31.8	25.0	26.1	0.0	0.0	0.0		
Limited-Scope:																					
Beckley MSA	3	15	11.5	30	0.0	0.0	0.0	3.4	0.0	6.7	88.2	100.0	86.7	8.3	0.0	6.7	0.0	0.0	0.0		
Morgantown CSA	2	8	7.7	10	0.0	0.0	0.0	7.1	0.0	10.0	48.4	100.0	90.0	44.6	0.0	0.0	0.0	0.0	0.0		
Non-MSA WV	9	70	34.6	56	0.0	0.0	0.0	2.2	0.0	0.0	63.3	44.4	75.0	34.5	55.6	25.0	0.0	0.0	0.0		
Total	26	191	100.0	165	1.7	0.0	0.6	8.0	3.8	9.1	59.7	65.4	69.7	30.6	30.8	20.6	0.0	0.0	0.0		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Charleston CSA	23	269	60.5	72	2.6	0.0	0.0	11.7	4.3	13.9	50.3	78.3	56.9	34.2	17.4	29.2	1.2	0.0	0.0
Limited-Scope:																			
Beckley MSA	5	32	13.2	26	0.0	0.0	0.0	7.6	0.0	3.8	67.1	80.0	76.9	25.3	20.0	19.2	0.0	0.0	0.0
Morgantown CSA	0	0	0.0	13	0.8	0.0	0.0	4.9	0.0	0.0	56.8	0.0	92.3	36.8	0.0	7.7	0.8	0.0	0.0
Non-MSA WV	10	125	26.3	50	0.0	0.0	0.0	4.6	0.0	10.0	51.6	50.0	68.0	43.8	50.0	22.0	0.0	0.0	0.0
Total	38	426	100.0	161	1.5	0.0	0.0	8.9	2.6	9.9	53.9	71.1	66.5	34.9	26.3	23.6	0.7	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charleston CSA	12	98	46.2	69	96.7	50.0	43.5	1.4	0.0	2.0	50.0
Limited-Scope:											
Beckley MSA	3	15	11.5	30	97.5	33.3	56.7	0.5	0.0	2.0	66.7
Morgantown CSA	2	8	7.7	10	98.9	0.0	20.0	0.5	0.0	0.5	100.0
Non-MSA WV	9	70	34.6	56	98.5	77.8	51.8	0.7	0.0	0.7	22.2
Total	26	191	100.0	165	97.4	53.8	47.3	1.0	0.0	1.6	46.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Charleston CSA	23	269	60.5	72	97.7	56.5	41.7	0.6	4.3	1.6	39.1
Limited-Scope:											
Beckley MSA	5	32	13.2	26	99.0	60.0	65.4	0.3	0.0	0.7	40.0
Morgantown CSA	0	0	0.0	13	99.2	0.0	38.5	0.4	0.0	0.4	0.0
Non-MSA WV	10	125	26.3	50	98.6	60.0	62.0	0.5	0.0	0.8	40.0
Total	38	426	100.0	161	98.3	57.9	51.6	0.5	2.6	1.2	39.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Milwaukee CSA	6,712	1,844,207	67.3	116,445	6.0	1.8	3.1	11.1	8.7	9.5	42.1	37.0	41.2	40.8	52.4	46.1	0.0	0.0	0.0	
Limited-Scope:																				
Appleton CSA	757	147,588	7.6	23,786	0.0	0.0	0.0	9.4	7.8	8.8	73.7	69.7	72.9	16.8	22.5	18.3	0.0	0.0	0.0	
Fond du Lac MSA	95	16,182	1.0	5,524	1.2	0.0	1.6	2.5	2.1	2.1	87.1	83.2	85.4	9.2	14.7	11.0	0.0	0.0	0.0	
Green Bay CSA	658	129,615	6.6	15,069	1.2	0.8	1.3	21.4	16.3	19.3	50.0	48.3	46.9	27.4	34.7	32.5	0.0	0.0	0.0	
Madison CSA	1,472	407,456	14.8	46,722	0.8	1.0	0.8	12.1	9.0	10.0	54.5	49.5	53.7	32.6	40.4	35.4	0.0	0.0	0.1	
Wausau CSA	224	42,755	2.2	9,338	0.6	1.3	0.8	7.1	5.8	7.7	68.6	65.2	65.8	23.7	27.7	25.7	0.0	0.0	0.0	
Non-MSA WI	58	8,669	0.6	1,190	0.0	0.0	0.0	20.1	22.4	18.3	79.9	77.6	81.7	0.0	0.0	0.0	0.0	0.0	0.0	
Total	9,976	2,596,472	100.0	218,074	3.5	1.5	2.0	11.4	9.1	10.0	52.1	43.4	50.1	33.0	46.0	37.8	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee CSA	1,727	521,224	65.2	62,915	4.7	7.4	4.9	11.3	14.6	12.1	41.3	36.1	40.3	42.5	41.6	42.5	0.1	0.2	0.2
Limited-Scope:																			
Appleton CSA	248	48,345	9.4	14,273	0.5	2.0	1.1	13.2	21.0	14.4	64.4	59.3	61.6	21.8	17.7	22.5	0.1	0.0	0.4
Fond du Lac MSA	52	9,811	2.0	3,060	0.0	0.0	0.0	12.4	17.3	14.5	67.0	65.4	68.2	20.5	17.3	17.2	0.0	0.0	0.0
Green Bay CSA	149	30,665	5.6	8,677	0.2	1.3	0.3	18.0	30.2	20.8	54.3	46.3	51.7	27.4	22.1	27.1	0.0	0.0	0.0
Madison CSA	368	107,475	13.9	26,415	0.7	0.3	0.6	12.5	14.9	12.0	56.8	51.9	56.9	29.8	32.6	30.3	0.1	0.3	0.2
Wausau CSA	90	18,352	3.4	5,479	0.0	0.0	0.0	14.8	17.8	16.0	64.5	65.6	67.3	20.7	16.7	16.7	0.0	0.0	0.0
Non-MSA WI	15	2,173	0.6	662	0.0	0.0	0.0	29.0	33.3	36.3	71.0	66.7	63.7	0.0	0.0	0.0	0.0	0.0	0.0
Total	2,649	738,045	100.0	121,481	2.6	5.1	2.8	12.7	16.4	13.3	50.5	42.8	49.3	34.1	35.5	34.4	0.1	0.2	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Milwaukee CSA	6,712	1,844,207	67.3	116,445	22.2	6.4	6.3	16.5	23.8	17.8	19.9	21.5	22.6	41.4	44.4	40.0	0.0	3.9	13.3	
Limited-Scope:																				
Appleton CSA	757	147,588	7.6	23,786	18.3	10.6	9.0	18.5	28.4	21.8	24.5	24.6	23.6	38.6	34.3	32.5	0.0	2.1	13.1	
Fond du Lac MSA	95	16,182	1.0	5,524	17.0	11.6	6.5	18.4	28.4	21.3	25.2	24.2	24.4	39.4	32.6	36.4	0.0	3.2	11.4	
Green Bay CSA	658	129,615	6.6	15,069	19.9	10.0	8.7	18.2	28.4	20.8	21.4	27.1	22.7	40.5	31.8	35.1	0.0	2.7	12.8	
Madison CSA	1,472	407,456	14.8	46,722	19.5	6.6	7.0	17.0	26.3	20.2	22.4	23.4	24.9	41.1	41.7	38.3	0.0	2.0	9.6	
Wausau CSA	224	42,755	2.2	9,338	17.1	7.1	7.7	18.8	18.3	20.0	23.1	33.5	23.4	41.0	38.4	34.7	0.0	2.7	14.2	
Non-MSA WI	58	8,669	0.6	1,190	25.3	13.8	14.5	20.0	17.2	20.1	24.2	25.9	18.7	30.6	39.7	34.1	0.0	3.4	12.5	
Total	9,976	2,596,472	100.0	218,074	20.7	7.1	7.0	17.2	24.7	19.2	21.3	22.7	23.3	40.8	42.1	38.1	0.0	3.3	12.4	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee CSA	1,727	521,224	65.2	62,915	21.5	13.6	9.1	17.0	22.2	20.7	20.7	21.8	22.7	40.8	36.7	36.1	0.0	5.6	11.3
Limited-Scope:																			
Appleton CSA	248	48,345	9.4	14,273	18.1	14.5	10.6	19.2	32.7	24.7	24.1	25.0	24.3	38.6	25.0	29.0	0.0	2.8	11.3
Fond du Lac MSA	52	9,811	2.0	3,060	17.1	17.3	17.1	20.2	44.2	26.6	25.2	30.8	23.8	37.4	7.7	21.5	0.0	0.0	11.0
Green Bay CSA	149	30,665	5.6	8,677	19.1	14.1	11.4	18.8	30.2	22.8	22.8	26.2	23.6	39.2	26.2	31.5	0.0	3.4	10.7
Madison CSA	368	107,475	13.9	26,415	17.7	12.5	8.4	18.1	22.0	20.4	23.1	20.9	25.6	41.1	40.5	36.9	0.0	4.1	8.6
Wausau CSA	90	18,352	3.4	5,479	16.5	8.9	10.2	18.4	24.4	24.0	23.9	25.6	25.0	41.2	38.9	30.5	0.0	2.2	10.4
Non-MSA WI	15	2,173	0.6	662	19.4	20.0	17.1	22.8	33.3	24.5	23.6	13.3	21.6	34.2	33.3	24.6	0.0	0.0	12.2
Total	2,649	738,045	100.0	121,481	19.8	13.5	9.6	17.8	24.2	21.6	22.0	22.5	23.7	40.4	35.0	34.4	0.0	4.8	10.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee CSA	10,195	222,271	62.5	43,468	10.0	4.8	9.3	11.6	9.3	10.6	39.8	37.4	37.8	38.3	48.1	42.0	0.4	0.3	0.3
Limited-Scope:																			
Appleton CSA	1,493	30,291	9.1	6,823	0.0	0.0	0.0	13.4	12.7	12.4	71.5	68.3	70.4	15.1	19.1	17.1	0.0	0.0	0.0
Fond du Lac MSA	305	5,063	1.9	1,806	9.0	7.5	6.5	5.2	3.9	2.9	78.2	79.7	81.7	7.6	8.9	8.8	0.0	0.0	0.0
Green Bay CSA	816	15,156	5.0	5,537	3.3	2.0	3.1	27.9	25.7	27.9	44.1	42.0	42.0	24.7	30.3	27.0	0.0	0.0	0.0
Madison CSA	2,903	55,440	17.8	12,457	2.3	1.2	1.8	15.6	12.8	14.3	47.0	48.5	47.6	33.2	35.5	35.0	1.9	2.0	1.3
Wausau CSA	540	11,375	3.3	3,259	4.3	1.7	3.6	8.2	4.6	7.4	66.6	73.9	70.8	20.9	19.8	18.2	0.0	0.0	0.0
Non-MSA WI	65	3,068	0.4	214	0.0	0.0	0.0	25.4	24.6	26.2	74.6	75.4	73.8	0.0	0.0	0.0	0.0	0.0	0.0
Total	16,317	342,664	100.0	73,564	6.5	3.5	6.4	13.5	10.8	12.4	47.4	44.6	45.5	32.1	40.5	35.4	0.6	0.6	0.4
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope:																			
Milwaukee CSA	16,534	209,153	60.1	41,268	9.9	3.8	6.9	14.0	9.2	12.5	36.0	35.5	36.3	39.5	51.2	43.9	0.6	0.3	0.4
Limited-Scope:																			
Appleton CSA	2,508	32,607	9.1	6,711	2.7	1.9	2.7	13.0	9.9	11.6	62.7	60.6	62.6	19.8	26.4	21.5	1.9	1.2	1.5
Fond du Lac MSA	467	5,355	1.7	1,505	0.0	0.0	0.0	19.7	15.0	18.4	63.5	63.4	63.7	16.8	21.6	17.9	0.0	0.0	0.0
Green Bay CSA	1,416	16,123	5.2	4,794	1.5	0.8	1.6	23.7	17.4	25.4	47.1	49.2	45.8	27.7	32.6	27.2	0.0	0.0	0.0
Madison CSA	5,567	66,534	20.3	11,731	4.5	3.5	4.4	13.1	9.7	11.9	50.2	48.2	50.6	29.4	36.8	31.3	2.8	1.8	1.8
Wausau CSA	921	11,263	3.4	3,410	0.0	0.0	0.0	19.1	17.3	17.4	60.3	59.9	62.6	20.6	22.8	20.0	0.0	0.0	0.0
Non-MSA WI	75	1,177	0.3	224	0.0	0.0	0.0	31.2	14.7	30.8	68.8	85.3	69.2	0.0	0.0	0.0	0.0	0.0	0.0
Total	27,488	342,212	100.0	69,643	6.8	3.2	5.2	14.8	10.2	13.6	44.3	42.5	43.9	33.1	43.5	36.6	1.1	0.6	0.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Milwaukee CSA	10,195	222,271	62.5	43,468	80.9	59.3	52.0	7.6	16.6	11.5	24.1
Limited-Scope:											
Appleton CSA	1,493	30,291	9.1	6,823	77.3	60.9	53.6	7.4	17.8	15.3	21.3
Fond du Lac MSA	305	5,063	1.9	1,806	78.9	59.0	60.7	6.8	22.3	14.4	18.7
Green Bay CSA	816	15,156	5.0	5,537	77.9	58.3	53.2	8.3	19.6	13.8	22.1
Madison CSA	2,903	55,440	17.8	12,457	81.8	64.5	50.6	6.1	14.5	12.1	21.0
Wausau CSA	540	11,375	3.3	3,259	78.6	55.7	56.2	7.0	23.1	14.4	21.1
Non-MSA WI	65	3,068	0.4	214	76.3	55.4	48.1	7.2	30.8	16.5	13.8
Total	16,317	342,664	100.0	73,564	80.4	60.2	52.4	7.3	16.8	12.4	23.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Milwaukee CSA	16,534	209,153	60.1	41,268	88.1	71.3	53.8	4.2	16.0	7.8	12.8
Limited-Scope:											
Appleton CSA	2,508	32,607	9.1	6,711	85.2	68.5	53.0	4.4	17.2	10.4	14.4
Fond du Lac MSA	467	5,355	1.7	1,505	85.2	65.5	54.6	4.3	21.4	10.4	13.1
Green Bay CSA	1,416	16,123	5.2	4,794	85.4	66.5	50.9	5.0	19.7	9.7	13.8
Madison CSA	5,567	66,534	20.3	11,731	87.8	73.4	53.7	3.7	13.7	8.5	13.0
Wausau CSA	921	11,263	3.4	3,410	85.5	70.1	56.7	4.3	14.4	10.2	15.4
Non-MSA WI	75	1,177	0.3	224	84.4	58.7	45.1	4.4	34.7	11.2	6.7
Total	27,488	342,212	100.0	69,643	87.3	71.0	53.6	4.2	15.9	8.5	13.1
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Milwaukee CSA	100	1,102	36.6	609	4.1	3.0	1.5	5.4	4.0	1.8	45.2	41.0	47.6	45.2	52.0	49.1	0.0	0.0	0.0	
Limited-Scope:																				
Appleton CSA	33	533	12.1	352	0.0	0.0	0.0	7.7	0.0	4.3	78.8	78.8	88.4	13.6	21.2	7.4	0.0	0.0	0.0	
Fond du Lac MSA	18	179	6.6	179	0.7	0.0	0.0	0.9	0.0	0.0	87.7	55.6	87.2	10.7	44.4	12.8	0.0	0.0	0.0	
Green Bay CSA	15	140	5.5	108	0.9	0.0	0.0	12.0	20.0	3.7	49.7	46.7	54.6	37.3	33.3	41.7	0.0	0.0	0.0	
Madison CSA	67	1,028	24.5	608	0.7	0.0	0.7	5.7	1.5	0.0	53.4	61.2	50.7	39.9	37.3	48.7	0.3	0.0	0.0	
Wausau CSA	33	365	12.1	370	0.1	0.0	0.0	2.3	0.0	0.3	80.7	81.8	84.9	16.9	18.2	14.9	0.0	0.0	0.0	
Non-MSA WI	7	79	2.6	29	0.0	0.0	0.0	7.9	0.0	3.4	92.1	100.0	96.6	0.0	0.0	0.0	0.0	0.0	0.0	
Total	273	3,426	100.0	2,255	1.9	1.1	0.6	5.6	2.9	1.4	58.1	58.2	65.0	34.3	37.7	33.0	0.1	0.0	0.0	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Full-Scope:																				
Milwaukee CSA	185	1,895	36.6	541	5.2	0.0	0.2	7.4	2.7	1.3	39.8	43.2	44.4	47.6	54.1	54.2	0.1	0.0	0.0	
Limited-Scope:																				
Appleton CSA	80	825	15.8	293	0.7	0.0	0.0	8.1	12.5	7.9	66.1	58.8	67.2	24.5	28.8	24.9	0.5	0.0	0.0	
Fond du Lac MSA	46	547	9.1	222	0.0	0.0	0.0	4.1	4.3	0.9	74.0	60.9	77.9	21.9	34.8	21.2	0.0	0.0	0.0	
Green Bay CSA	21	298	4.2	129	0.3	0.0	0.0	10.7	4.8	0.0	59.9	38.1	72.9	29.1	57.1	27.1	0.0	0.0	0.0	
Madison CSA	125	1,268	24.8	455	1.4	0.0	0.2	6.6	4.8	2.9	63.7	71.2	66.8	27.9	24.0	30.1	0.5	0.0	0.0	
Wausau CSA	35	452	6.9	292	0.0	0.0	0.0	12.3	11.4	12.3	67.7	77.1	64.7	20.0	11.4	22.9	0.0	0.0	0.0	
Non-MSA WI	13	198	2.6	33	0.0	0.0	0.0	20.7	7.7	12.1	79.3	92.3	87.9	0.0	0.0	0.0	0.0	0.0	0.0	
Total	505	5,483	100.0	1,965	2.7	0.0	0.1	7.9	5.7	4.3	54.5	57.6	62.4	34.7	36.6	33.2	0.2	0.0	0.0	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Milwaukee CSA	100	1,102	36.6	609	94.8	68.0	60.8	3.7	13.0	1.5	19.0
Limited-Scope:											
Appleton CSA	33	533	12.1	352	95.9	48.5	60.5	2.9	30.3	1.2	21.2
Fond du Lac MSA	18	179	6.6	179	94.4	50.0	68.2	4.9	22.2	0.7	27.8
Green Bay CSA	15	140	5.5	108	93.2	33.3	48.1	5.2	26.7	1.7	40.0
Madison CSA	67	1,028	24.5	608	95.8	68.7	57.4	2.4	10.4	1.8	20.9
Wausau CSA	33	365	12.1	370	95.7	51.5	62.7	3.6	33.3	0.7	15.2
Non-MSA WI	7	79	2.6	29	91.1	14.3	37.9	5.9	57.1	3.0	28.6
Total	273	3,426	100.0	2,255	95.1	59.3	59.8	3.4	19.4	1.4	21.2
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Milwaukee CSA	185	1,895	36.6	541	96.3	80.0	58.6	2.3	4.3	1.4	15.7
Limited-Scope:											
Appleton CSA	80	825	15.8	293	96.9	56.3	44.0	2.1	22.5	1.0	21.3
Fond du Lac MSA	46	547	9.1	222	95.9	67.4	60.4	3.6	13.0	0.5	19.6
Green Bay CSA	21	298	4.2	129	95.0	42.9	48.1	3.2	23.8	1.7	33.3
Madison CSA	125	1,268	24.8	455	96.8	68.8	60.7	1.8	11.2	1.4	20.0
Wausau CSA	35	452	6.9	292	96.7	68.6	49.0	2.8	25.7	0.5	5.7
Non-MSA WI	13	198	2.6	33	92.6	53.8	36.4	5.2	30.8	2.2	15.4
Total	505	5,483	100.0	1,965	96.4	69.3	54.6	2.3	12.7	1.3	18.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Full-Scope:																				
Cheyenne MSA	89	24,8845	43.4	8,097	0.0	0.0	0.0	22.8	15.7	18.1	50.7	60.7	56.7	26.5	23.6	25.3	0.0	0.0	0.0	
Limited-Scope:																				
Non-MSA WY	116	324,583	56.6	1,537	0.0	0.0	0.0	0.0	0.0	0.0	39.5	28.4	44.6	60.5	71.6	55.4	0.0	0.0	0.0	
Total	205	349,468	100.0	9,634	0.0	0.0	0.0	19.1	6.8	15.2	48.9	42.4	54.7	32.0	50.7	30.1	0.0	0.0	0.0	
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope:																			
Cheyenne MSA	53	15,397	49.5	4,417	0.0	0.0	0.0	11.3	9.4	11.8	57.1	62.3	58.2	31.7	28.3	29.9	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA WY	54	129,897	50.5	809	0.0	0.0	0.0	0.0	0.0	0.0	25.4	25.9	31.9	74.6	74.1	68.1	0.0	0.0	0.0
Total	107	145,294	100.0	5,226	0.0	0.0	0.0	9.5	4.7	10.0	51.9	43.9	54.2	38.6	51.4	35.8	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2020-2021	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope:																			
Cheyenne MSA	89	24,885	43.4	8,097	19.5	5.6	7.5	18.2	27.0	20.1	23.1	28.1	20.5	39.3	37.1	25.7	0.0	2.2	26.3
Limited-Scope:																			
Non-MSA WY	116	324,583	56.6	1,537	10.4	0.0	1.2	12.5	0.0	3.4	22.3	1.7	8.3	54.8	59.5	71.2	0.0	38.8	15.8
Total	205	349,468	100.0	9,634	18.0	2.4	6.5	17.3	11.7	17.4	23.0	13.2	18.5	41.8	49.8	32.9	0.0	22.9	24.6
Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Full-Scope:																				
Cheyenne MSA	53	15,397	49.5	4,417	17.3	9.4	8.2	17.9	28.3	23.2	25.0	18.9	24.2	39.7	39.6	26.6	0.0	3.8	17.8	
Limited-Scope:																				
Non-MSA WY	54	129,897	50.5	809	10.1	0.0	1.2	12.7	0.0	4.2	24.6	3.7	6.8	52.6	59.3	71.9	0.0	37.0	15.8	
Total	107	145,294	100.0	5,226	16.0	4.7	7.1	16.9	14.0	20.2	24.9	11.2	21.5	42.2	49.5	33.6	0.0	20.6	17.5	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Full-Scope:																					
Cheyenne MSA	777	11,122	72.2	3,161	0.0	0.0	0.0	14.5	7.9	10.0	68.3	81.6	78.3	16.8	10.6	11.5	0.4	0.0	0.1		
Limited-Scope:																					
Non-MSA WY	299	3,383	27.8	1,747	0.0	0.0	0.0	0.0	0.0	0.0	60.5	63.2	59.5	39.5	36.8	40.5	0.0	0.0	0.0		
Total	1,076	14,505	100.0	4,908	0.0	0.0	0.0	10.6	5.7	6.4	66.2	76.5	71.6	22.9	17.8	21.8	0.3	0.0	0.1		
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full-Scope:																				
Cheyenne MSA	1,822	27,025	75.9	3,825	0.0	0.0	0.0	64.8	69.4	62.4	22.2	19.0	23.3	12.8	11.3	14.1	0.2	0.3	0.2	
Limited-Scope:																				
Non-MSA WY	579	8,744	24.1	1,831	0.0	0.0	0.0	0.0	0.0	0.0	26.7	33.3	37.0	73.3	66.7	63.0	0.0	0.0	0.0	
Total	2,401	35,769	100.0	5,656	0.0	0.0	0.0	49.4	52.7	42.2	23.2	22.5	27.8	27.2	24.6	29.9	0.2	0.2	0.1	
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Cheyenne MSA	777	11,122	72.2	3,161	83.3	77.5	52.9	3.8	12.0	12.9	10.6
Limited-Scope:											
Non-MSA WY	299	3,383	27.8	1,747	86.6	70.9	44.0	5.9	14.7	7.5	14.4
Total	1,076	14,505	100.0	4,908	84.2	75.7	49.7	4.4	12.7	11.4	11.6
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope:											
Cheyenne MSA	1,822	27,025	75.9	3,825	93.9	81.8	53.9	1.3	11.9	4.8	6.3
Limited-Scope:											
Non-MSA WY	579	8,744	24.1	1,831	93.7	69.1	40.9	2.6	21.9	3.7	9.0
Total	2,401	35,769	100.0	5,656	93.8	78.7	49.7	1.6	14.3	4.6	7.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2020-2021	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Cheyenne MSA	27	324	79.4	86	0.0	0.0	0.0	7.1	0.0	4.7	70.0	77.8	89.5	22.9	22.2	5.8	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA WY	7	91	20.6	23	0.0	0.0	0.0	0.0	0.0	0.0	45.4	42.9	21.7	54.6	57.1	78.3	0.0	0.0	0.0
Total	34	415	100.0	109	0.0	0.0	0.0	5.6	0.0	3.7	64.7	70.6	75.2	29.8	29.4	21.1	0.0	0.0	0.0
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																		2022-2023	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Full-Scope:																			
Cheyenne MSA	38	481	88.4	91	0.0	0.0	0.0	18.1	23.7	6.6	42.8	47.4	51.6	39.1	28.9	41.8	0.0	0.0	0.0
Limited-Scope:																			
Non-MSA WY	5	63	11.6	10	0.0	0.0	0.0	0.0	0.0	0.0	29.2	0.0	30.0	70.8	100.0	70.0	0.0	0.0	0.0
Total	43	544	100.0	101	0.0	0.0	0.0	13.8	20.9	5.9	39.6	41.9	49.5	46.7	37.2	44.6	0.0	0.0	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%																			

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Cheyenne MSA	27	324	79.4	86	97.7	92.6	60.5	1.1	3.7	1.1	3.7
Limited-Scope:											
Non-MSA WY	7	91	20.6	23	95.9	57.1	47.8	1.0	0.0	3.1	42.9
Total	34	415	100.0	109	97.3	85.3	57.8	1.1	2.9	1.6	11.8
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Full-Scope:											
Cheyenne MSA	38	481	88.4	91	98.5	81.6	57.1	0.7	0.0	0.7	18.4
Limited-Scope:											
Non-MSA WY	5	63	11.6	10	97.7	80.0	70.0	0.6	0.0	1.8	20.0
Total	43	544	100.0	101	98.3	81.4	58.4	0.7	0.0	1.0	18.6
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%											