



PUBLIC DISCLOSURE

October 1, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

1800 Tysons Boulevard
Tysons, VA 22102

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

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

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Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- The Lending Test rating is based on an Outstanding rating in all the bank’s rating areas.
- The Investment Test rating is based on an Outstanding rating in all the bank’s rating areas.
- The Service Test rating is based on a majority of rating areas receiving a High Satisfactory rating.

Lending in Assessment Area

A high percentage of the bank’s loans are in its assessment areas (AAs).

The bank originated and purchased 80.2 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This factored favorably into the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	26,533	86.6	4,114	13.4	30,647	12,262,253	87.7	1,713,999	12.3	13,976,252
Small Business	23,654	74.1	8,280	25.9	31,934	1,685,307	76.2	525,439	23.8	2,210,746
Small Farm	3	37.5	5	62.5	8	728	23.3	2,400	76.7	3,128
Total	50,190	80.2	12,399	19.8	62,589	13,948,288	86.2	2,241,838	13.8	16,190,126

Description of Institution

HSBC Bank USA, National Association is an interstate bank headquartered in Tysons, Virginia, with principal executive offices in New York City (NYC). As of December 31, 2017, HBUS had total assets of \$180.4 billion and total deposits of \$133.1 billion. HBUS is a subsidiary of HSBC USA Inc., which is a subsidiary of HSBC North America Holdings Inc. (HNAH). HSBC Holdings plc (HSBC), based in London, UK is the parent of HNAH and is ranked as one of the world's largest banking and financial service organizations, with assets of \$2.5 trillion as of December 31, 2017. HBUS offers a full range of commercial and consumer banking products and had approximately 1.4 million customers. HBUS offers products and services to individuals, corporations, institutions, and governments, through its Retail Banking and Wealth Management (RBWM), Commercial Banking, Global Banking and Markets, and Private Banking businesses.

For this evaluation, there are six rating areas. This includes one Combined Statistical Area (CSA) and two Multistate Metropolitan Statistical Area (MMSA)s where the bank operated in at least two states.

At year-end 2017, HBUS operated 229 retail branches with 49 or 21.4 percent of these branches located in low- and moderate- income (LMI) geographies and 399 ATMs with 92 or 23.1 percent of these ATMs in LMI geographies.

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

Loan Mix	01/01/2015		12/31/2017		% Growth / (Decline) in Period
	Balance Sheet \$ Amount (000)	% of Total Loans	Balance Sheet \$ Amount (000)	% of Total Loans	
Real Estate Loans	28,817,866	39.2	29,120,093	43.8	1.0
Commercial Loans	36,436,646	49.5	26,981,795	40.6	(25.9)
Individual Loans	1,237,707	1.7	1,125,590	1.7	(9.1)
Agricultural Loans	280,010	0.4	249,869	0.4	(10.8)
All Other Loans/Leases	6,831,235	9.2	8,989,295	13.5	31.6
Total Loans/Leases	73,603,454		66,466,642		(9.7)
Total Assets	178,676,927		180,371,724		0.9
Total Deposits*	117,316,713		137,711,320		17.4
Net Income	410,806		(232,763)		(156.7)
Tier 1 Capital	17,214,516		19,294,161		12.1

Source: FFIEC Call Reports, FDIC Summary of Deposits

*Represents international and domestic deposits. For CRA performance and capital allocated to AAs, total deposits were adjusted to \$128.2 billion for 2017.

The bank was not constrained by any financial impediments that would hinder its ability to meet the credit, investment, and service needs of its communities. During the evaluation period, the bank operated under multiple consent orders, which limited the bank's ability to open new branches.

HBUS was rated "Satisfactory" at its previous CRA evaluation dated December 31, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large institution Lending, Investment, and Service Tests. The evaluation period is January 1, 2015 to December 31, 2017.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions reached in the aggregate. Loans to farms were not considered because the bank made very few reportable farm loans during the evaluation period.

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

Selection of Areas for Full-Scope Review

In each state where HBUS has an office, one AA within that state was selected for a full-scope review. With the exception of the state of California, all rating areas contained one AA and received a full-scope review. Both AAs in the state of California also received a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA.

Ratings

The bank's overall rating is a blend of the CSA, MMSAs, and state ratings. Bank performance in each of the evaluation years were weighted equally. The New York CSA rating area carried the greatest emphasis in the OCC's conclusions as this area represented HBUS' most significant market with 86 percent of HBUS' adjusted deposits, 58 percent of loans originated and purchased, and 69 percent of the branch network.

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

Other Information

AAs – The OCC determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that HBUS's branches service and did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic

distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Deposit Market Share - The OCC used summary deposit data reported to the Federal Deposit Insurance Corporation as of June 30, 2017, unless otherwise noted. This was the most recent public data available during the evaluation period.

Business Banking - In January 2016, HBUS' Retail Business Banking (RBB) segment, defined as commercial clients with annual turnover of less than \$5 million, was transferred from Commercial Banking to RBWM. RBB has developed a small business product and has streamlined the application approval process to better serve its local business communities.

Flexible and Innovative Lending Products - The bank offered CRA affordable mortgage products during the evaluation period. Flexible products offered in all AAs include Community Works and FHA. Community Works offers affordable low down payment mortgage options to first-time homebuyers that meet LMI income requirements and/or purchase property in an LMI designed census tract. During the evaluation period, the bank originated 183 Community Works mortgages totaling \$30.4 million and 21 FHA mortgages totaling \$6.7 million.

Junior Achievement – HBUS' s officers and employees provided over 5,200 hours to Junior Achievement, a program primarily focused on teaching young people about the importance of money management, workforce readiness, and entrepreneurial thinking. The majority of students in this program are low-income. This program was provided in all AAs.

Lending Test

The OCC evaluated home mortgage and small loans to business in each AA. The OCC did not analyze or draw conclusions on a particular loan product if HBUS made less than 20 loans during the evaluation period because this analysis would not provide substantive conclusions. The OCC did not analyze HBUS' small farm or consumer loans, as none of the full-scope AAs had a sufficient number of small farm or consumer loans.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans, the OCC gave greater consideration to HBUS' performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units or businesses in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level of the AA as well as the significant affordability barriers that exist in certain markets.

The OCC also considered the volume of community development (CD) loans and the degree of responsiveness of those loans to the needs in the community.

Investment Test

The OCC gave equal consideration to the volume of investments and grants made during the current evaluation period and those made in prior evaluation periods that remain outstanding. The OCC also considered how responsive the investments were to the needs of the communities. In most AAs, the investments were considered non-complex. The bank has used low-income housing tax credits (LIHTCs) in larger AAs.

Service Test

The OCC gave primary consideration to HBUS' performance in delivering retail products and services to geographies and individuals of different income levels through HBUS' distribution of branches. The OCC focused on branches in LMI geographies. The 2015 ACS census tract update impacted HBUS' branch locations. Prior to the ACS update, HBUS had a total of 59 LMI branches out of 229 total branches; however, the 2015 ACS update resulted in a reduction to 49 LMI branches.

The OCC evaluated the range of products and services offered by HBUS through its branch network with emphasis on accessibility to LMI borrowers. Products and services offered are consistent throughout the branch network. The OCC specifically focused on any differences in branch hours and services in LMI geographies compared to those in middle- and upper- income geographies. HBUS offers a wide range of traditional deposit and banking products and services. They also offer multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone and online banking, electronic bill-pay, remote deposit capture, and mobile banking options. We evaluated the level of retail services provided to LMI borrowers through bank-provided analysis. ATMs are available at all branches.

The OCC evaluated HBUS' record of providing CD services. Our primary consideration was responsiveness of the services to the needs of the community. The OCC gave the most consideration to CD services that addressed critical needs or were most impactful to the AAs.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

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

Combined Statistical Area Rating

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

CRA rating for the NY CSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made a relatively high level of CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in NY CSA

HBUS's AA is comprised of geographies in New York, New Jersey, and Connecticut. The bank conducts operations within three MDs in the New York-Newark-Jersey City MSA: New York-Jersey City-White Plains, NY-NJ MD consisting of Bergen, Hudson, and Middlesex counties in NJ and Bronx, Kings, New York, Orange, Queens, Richmond, Rockland, and Westchester counties in NY; Nassau County-Suffolk County, NY MD in its entirety; and the Newark, NJ MD consisting of Morris and Union counties in NJ. The AA also includes the Bridgeport, CT MSA consisting of Fairfield County in its entirety.

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

HBUS had \$109.9 billion in deposits in the CSA representing 85.7 percent of adjusted deposits. The local banking environment is highly competitive with 204 FDIC-insured institutions

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

operating 4,844 branches. HBUS ranked fourth in deposit market share with 6.3 percent. The top three banks by deposit market share are JPM Chase with 33.8 percent, Citibank with 6.9 percent, and Bank of America with 6.9 percent. In addition to FDIC-insured institutions, this area is served by a number of credit unions. HBUS operated 158 branches and 1,240 ATMs in the CSA, representing 69 percent of total branches and 51.9 percent of total ATMs.

The area poses a number of challenges to home mortgage lenders in the AA, including HBUS. The CSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the CSA is \$484,802 while the National Association of Realtors (NAR) 4Q2017 median sales price of a single-family home ranged from \$404,300 to \$455,900. One simplistic method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4 percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,169 (or less than 50 percent of the FFIEC adjusted median family income in the AA) could afford a \$198,278 mortgage with a payment of \$947 per month; a moderate-income borrower earning \$65,863 (or less than 80 percent of the FFIEC adjusted median family income in the AA) could afford a \$317,209 mortgage with a payment of \$1,514 per month. Another simplistic method is that the median housing value is 11.8 times greater than the maximum income of a low-income borrower and 7.4 times greater than the maximum income of a moderate-income borrower.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the NY CSA, the overall poverty level was 14 percent. However, in low-income tracts, the household poverty rate increases to 37 percent and in moderate-income tracts it increases to 21 percent. In middle- and upper-income tracts, the combined poverty level is 9 percent.

As part of the CRA evaluation, the OCC reviewed information from 11 community contacts made within the NY CSA to determine local economic conditions and community needs. These contacts included representatives from affordable housing organizations, community and economic development organizations, and social service groups. Needs identified include more affordable rental and owner-occupied housing, small business loans, workforce development, high quality and affordable day care and afterschool programs, and financial literacy and education.

NY CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NY CMMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,080	11.1	22.8	32.0	32.1	2.1
Population by Geography	17,352,283	12.5	23.3	30.7	33.2	0.3
Housing Units by Geography	6,754,622	11.6	22.3	30.3	35.7	0.2
Owner-Occupied Units by Geography	3,052,723	2.7	13.9	36.7	46.5	0.1
Occupied Rental Units by Geography	3,129,023	20.3	30.2	24.4	24.9	0.2
Vacant Units by Geography	572,876	10.7	23.8	28.7	36.6	0.3
Businesses by Geography	1,203,102	7.0	16.4	29.5	45.8	1.3
Farms by Geography	17,487	3.7	14.7	34.9	46.4	0.3
Family Distribution by Income Level	4,068,355	25.6	15.6	17.2	41.6	0.0
Household Distribution by Income Level	6,181,746	27.4	14.3	15.9	42.5	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$484,802
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Median Gross Rent			\$1,357
Median Family Income MSA - 35084 Newark, NJ-PA MD		\$95,579	Families Below Poverty Level			11.6%
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047				
<i>Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in NY CSA

The NY CSA received a full-scope review. The Bridgeport-Stamford-Norwalk, CT MSA and all MDs within the New York-Newark-Jersey City, NY-NJ-PA MSA were combined in evaluating performance under each test.

Small loans to businesses received greater weight based on the volume of loan originations in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NY CSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	11,347	17,798	2	144	29,329

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	\$4,664,038	\$1,407,794	\$323	\$1,354,386	\$7,426,521

HBUS ranked fourth in deposits with 6.3 percent market share. In small loans to businesses, HBUS ranked 11th with a market share of 1.4 percent. The top three lenders with a combined market share of 58.4 were American Express with 34 percent, Chase Bank USA with 17.1 percent, and Capital One with 7.3 percent. In overall HMDA lending, HBUS ranked 12th with 1.3 percent market share. While the HMDA lending market share is lower than the bank's deposit market share, this is a highly competitive market with 924 home mortgage lenders. The top lender in this market was Wells Fargo Bank with 8.7 percent market share followed by JPMorgan Chase with 6.8 percent and Quicken Loans with 5.2 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

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

2015 to 2016

Performance was consistent with 2017.

Small Loans to Businesses

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

2017

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

2015 to 2016

Performance was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers is significantly weaker than the proportion of low-income families within the AA, but stronger than the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans. The high housing cost and poverty levels within the CSA constrain lending opportunities to LMI borrowers.

2015 to 2016

Performance to low-income borrowers was consistent with 2017. The proportion of loans to moderate-income borrowers substantially met the proportion of moderate-income families and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

2017

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

2015 to 2016

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

Community Development Lending

HBUS has made a relatively high level of CD loans.

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

HBUS originations of CD loans represents 8.8 percent of allocated tier 1 capital. The loans supported a variety of CD purposes identified as community needs, including affordable housing, economic development, and community services.

Examples include:

- HBUS provided a \$25 million commitment to recapitalize a revolving loan fund. The fund provides financing for acquisition, predevelopment, and moderate rehabilitation costs associated with the development and preservation of multifamily affordable, supportive, and mixed income rental housing throughout NYC.
- HBUS provided a \$15 million loan to capitalize a community revolving loan fund. The fund's mission is to provide development capital to create affordable homes and to rebuild communities.
- HBUS financed an \$11.6 million mortgage on a property that provides 36 units of affordable housing on Long Island. Residents must earn less than 80 percent of AMI.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA's credit needs. In the NY CSA, the bank offers State of NY Mortgage Agency (SONYMA) loans. This program is a competitive, fixed interest rate program which provides affordable mortgage financing and down payment assistance. During the evaluation period, the bank originated 85 loans totaling \$18.6 million.

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NY CMMSA	45	243,565	257	1,015,797	302	100	1,259,362	100	2	6,834

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

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

The combined prior and current period dollar volume represents 8.2 percent of allocated tier 1 capital. Examples include:

- HBUS purchased a \$45.2 million mortgage backed security (MBS) with the underlying property consisting of a 139-unit building. The building is 100 percent LIHTC and Project Based Section 8. The LIHTC expiration period is 30 years. Set asides are 28 units at 50 percent of AMI and 111 units at 60 percent of AMI.
- HBUS was the sole investor in a \$27.4 million LIHTC new construction mixed use project with 167 apartments located in the Bronx. The project is being developed pursuant to the Extremely Low- & Low-Income Affordability program of the NYC Department of Housing Preservation and Development. The units may be leased to households earning between 30 and 60 percent of AMI.
- HBUS was the sole investor in an \$11.4 million LIHTC new construction project with 66 housing units in the East Flatbush section of Brooklyn. Fifty of the units will be covered by a rental and service subsidy from the NYS Office of Mental Health. All of the units are set aside for households earning 60 percent or less of the AMI.

SERVICE TEST

The institution’s performance under the Service Test in NY CSA is rated High Satisfactory.

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%) *				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
NY CSA	100	158	100	10.1	12.7	31.6	44.3	12.5	23.3	30.7	33.2

* Two branches are located in geographies that do not have income designations.

**0.3% of the population in the NY CSA live in CTs with no income designation.

Distribution of Branch Openings/Closings					
Branch Openings/Closings***					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Moderate	Middle	Upper
0	4	0	0	-2	-2

The proportion of branches in low-income geographies is near to the proportion of the low-income population in those geographies. The proportion of branches in moderate-income branches is below the proportion of the moderate-income population in those geographies. However, as a result of the 2015 ACS, a net loss of seven branches in moderate-income geographies occurred with the income reclassification of geographies.

The institution’s opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Two branches in middle-income geographies and two branches in upper-income geographies were closed due to high cost and poor financial performance.

Services, including where appropriate business hours, do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. Branch hours are consistent with extended hours on Thursdays. Additionally, 116 branches offer Saturday hours with 11 percent of these branches in low- and 14 percent in moderate-income tracts.

Community Development Services

The institution provides a significant level of CD services.

HBUS employees provided 8,723 hours of services to 67 organizations that meet the definition of CD. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

Examples include:

- HBUS' participation in the Federal Home Loan Bank of New York programs consisting of the First Home Club (FHC) and Affordable Housing Program (AHP) is responsive to the affordable housing need in the NY CSA. AHP funds are awarded to members who submit applications on behalf of project sponsors who are planning to purchase, rehabilitate, or construct affordable homes or apartments. The FHC Program assists first-time homebuyers with incomes at or below 80 percent of AMI. Assistance is provided in the form of matching funds based on the household's systematic savings within a dedicated savings account. During the evaluation period the bank sponsored four community partners for the AHP. The bank enrolled 933 LMI households in the FHC. By the end of the evaluation period, 127 achieved their savings goal and purchased a home with the savings.
- Members of HBUS legal staff provided 189 hours of pro bono legal assistance to the Neighborhood Entrepreneur Legal Project (NELP). NELP provides low- to moderate-income micro-entrepreneurs with the legal services necessary to start their businesses.

Multistate Metropolitan Statistical Area Rating

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

CRA rating for the Philadelphia MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA, given the bank's very limited presence.
- A good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Philadelphia MMSA

HBUS operates within a portion of the Philadelphia MMSA and has a very limited presence. The bank's AA includes Philadelphia County in Pennsylvania and New Castle County in Delaware. The bank operates three branches and had \$525.6 million in deposits, or less than one percent of adjusted bank deposits and ranked 21st with a 0.2 percent market share. Major competitors include TD Bank, Wells Fargo Bank, and PNC Bank, each with a substantially larger branch network.

The poverty level across the Philadelphia MMSA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to

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

qualify for a home loan than those with income above poverty. In the Philadelphia MMSA, the overall poverty level was 16.9 percent. However, in low-income geographies, the household poverty rate increases to 45 percent and in moderate-income geographies it increases to 28 percent. In middle- and upper-income geographies, the combined poverty level is just 12 percent.

To understand the credit and community development needs in the area, OCC representatives met with six community-based organizations. Participants noted a need for affordable housing, and small business loans, homeownership counseling, workforce development, financial literacy, and commercial real estate loans.

Philadelphia MMSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	515	11.3	32.6	26.8	26.4	2.9
Population by Geography	2,104,715	11.4	33.4	29.4	25.3	0.5
Housing Units by Geography	889,650	11.0	33.5	28.5	26.8	0.3
Owner-Occupied Units by Geography	445,559	7.5	28.7	32.5	31.2	0.0
Occupied Rental Units by Geography	337,759	13.9	36.6	25.3	23.6	0.7
Vacant Units by Geography	106,332	16.4	43.6	21.6	18.1	0.2
Businesses by Geography	127,712	7.0	26.8	27.1	37.5	1.6
Farms by Geography	1,370	3.6	19.6	36.2	39.8	0.7
Family Distribution by Income Level	442,546	27.6	17.8	17.8	36.7	0.0
Household Distribution by Income Level	783,318	29.4	15.7	16.2	38.8	0.0
Median Family Income MSA - 37964 Philadelphia, PA MD		\$56,411	Median Housing Value			\$188,943
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$80,707	Median Gross Rent			\$971
			Families Below Poverty Level			16.9%

*Source: 2015 ACS Census and 2017 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Philadelphia MMSA

The Philadelphia MMSA received a full-scope review. Home mortgage lending received significantly greater weight based on the volume of loan originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADLEPHIA MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Philadelphia MMSA is rated Outstanding.

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs, given the bank’s very limited presence and significant competition.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	1,455	212	0	13	1,680

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	\$260,226	\$11,574	0	\$19,900	\$291,700

Lending activity is excellent when considering the bank’s very limited presence and competition in the AA. As noted earlier, the bank had 0.2 percent deposit market share and ranked 21st of 61 banks operating in the AA. In overall HMDA lending, the bank ranked 51st with 0.5 percent market share. There are 643 home mortgage lenders in the MMSA. Wells Fargo led the market with 9.4 percent market share. In small loans to businesses, the bank ranked 25th with 0.4 percent market share. The top three lenders and their market share were American Express with 23.7 percent, PNC Bank with 9.8 percent, and Capital One Bank with 7.6 percent for a combined market share of 41.1 percent. There are 150 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

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

geographies, the proportion of loans exceeded both the proportion of owner-occupied units and the aggregate distribution of loans.

2015 to 2016

Performance in moderate-income geographies was consistent with 2017 performance. In low-income geographies, the proportion of loans was well below the proportion of owner-occupied housing and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

2017

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

2015 to 2016

Performance was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was weaker than the proportion of low-income families and stronger than the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was significantly stronger than both the proportion of moderate-income families and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses approximates the proportion of small businesses and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance was inconsistent with 2017. The proportion of loans to small businesses was well below the proportion of small businesses and exceeded the aggregate distribution of loans.

Community Development Lending

The institution is a leader in making CD loans.

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

HBUS originations of CD loans represents 27 percent of allocated tier 1 capital. One example includes:

- HBUS renewed revolving lines of credit totaling \$4.5 million to three CDFIs in support of their loan funds. The funds provide loans to support affordable housing, small businesses, economic development, and community services targeting low- and moderate-income persons.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia MMA	5	56,994	52	25,886	57	100	\$82,880	100	0	0

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

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

The combined prior and current period dollar volume exceeds allocated tier 1 capital. HBUS’s investments targeted affordable housing, a primary need in the Philadelphia MMSA. The investments consisted of LIHTCs, MBSs backed by mortgage loans to LMI borrowers, and equity investments.

A major investment included:

- HBUS invested \$5 million in a qualified LIHTC fund that will benefit two affordable senior housing projects in Philadelphia. The projects contain a total of 590 units. Both of these properties were built or renovated using funding from HUD’s Section 202 Supportive Housing for the Elderly program and residency is restricted to households earning 50 percent or less of the AMI.

SERVICE TEST

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

Based on a full-scope review, the institution’s performance in the Philadelphia MMSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Philadelphia MMA	100	3	100	0	33.3	33.3	33.3	11.4	33.4	29.4	25.3

The bank operates two branches in Philadelphia, Pennsylvania and one branch in Wilmington, Delaware. The Delaware branch is located in a moderate-income geography.

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

Services, including where appropriate, business hours, do not vary in any way that inconveniences the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The two branches in Philadelphia have extended hours on Friday. The Arch Street branch in Philadelphia also has Saturday hours.

Community Development Services

The bank provides a significant level of CD services. One employee served on the board of four different organizations that provide community services to low- and moderate-income persons. Additionally, 37 employees provided 613 hours to 15 organizations serving low- and moderate-income persons. The majority of service provided included financial literacy and education sessions.

Multistate Metropolitan Statistical Area Rating

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

CRA rating for the DC MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of home mortgage loans and good distribution of small loans to businesses.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in DC MMSA

The AA in the DC MMSA is comprised of the District of Columbia; Montgomery County in Maryland, and the following counties and independent cities in Virginia: Alexandria City, Arlington County, Fairfax City, Fairfax County, and Falls Church City. HSBC operates 12 branches within the MMSA with total deposits of \$2.3 billion or 1.8 percent of the bank's adjusted deposits and a market share of 1.2 percent. Eighty-eight percent of the deposits of the DC branches are derived from serving the embassies and are centered on deposit products that cater to this market. Major competitors and their deposit market share include E*TRADE Bank with 20 percent, Wells Fargo Bank with 13.8 percent, Bank of America with 12.9 percent, and Capital One with 12.1 percent. With the exception of E*TRADE, all have a substantially larger branch network compared to HBUS.

The DC MMSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value of a single family home in the DC MMSA is

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

\$494,471. The NAR 4Q2017 median sales price is \$406,700. The median housing value exceeds the maximum income of a low-income individual by nine times.

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the DC MMSA, the overall poverty level was 8 percent. However, in low-income tracts, the household poverty rate increases to 23 percent and in moderate-income tracts it increases to 11 percent. In middle- and upper-income tracts, the combined poverty level is 5 percent.

To understand the credit and community development needs in the area, OCC representatives met with five community-based organizations. Participants noted a need for affordable housing, small business financing, and financial education and counseling.

DC MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: DC MMSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	757	11.6	14.7	29.5	42.5	1.7
Population by Geography	3,204,035	11.2	14.6	30.9	42.4	0.9
Housing Units by Geography	1,294,329	11.2	14.5	31.2	42.3	0.7
Owner-Occupied Units by Geography	701,160	4.6	11.3	31.3	52.5	0.3
Occupied Rental Units by Geography	508,773	19.0	18.7	31.7	29.3	1.3
Vacant Units by Geography	84,396	18.2	15.7	28.3	37.0	0.8
Businesses by Geography	278,234	4.6	13.3	30.6	50.6	1.0
Farms by Geography	3,303	4.1	10.8	33.7	51.0	0.3
Family Distribution by Income Level	739,509	21.4	14.6	18.3	45.7	0.0
Household Distribution by Income Level	1,209,933	22.9	15.2	17.7	44.2	0.0
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD		\$112,655	Median Housing Value			\$494,471
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV MD		\$106,762	Median Gross Rent			\$1,618
			Families Below Poverty Level			6.0%

*Source: 2015 ACS Census and 2017 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in DC MMSA

The DC MMSA received a full-scope review. Home mortgage lending received substantially greater weight based on the volume of loan originations. The high cost of housing and poverty levels within the MMSA was considered in the bank's performance under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DC MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, given competition and the bank's limited presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	1,799	516	0	14	2,327

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
DC MMSA	\$717,486	\$27,491	\$0	\$101,500	\$846,477

Lending activity is good when considering the significant competition in the AA relative to the bank's presence. HBUS had \$2.3 billion in deposits and ranked 14th with 1.2 percent market share. In HMDA lending, HBUS ranked 42nd with 0.6 percent market share. There are 713 home mortgage lenders in the AA. Wells Fargo Bank led the market with 9.1 percent market share followed by SunTrust Bank with 5.9 percent and Quicken Loans with 3.4 percent. In small loans to businesses, HBUS ranked 22nd with 0.3 percent market share. American Express led the market with 27.4 percent market share followed by Bank of America with 11.5 percent and Chase Bank USA with 11 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

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

2015 to 2016

Performance in both low- and moderate income geographies was consistent with 2017.

Small Loans to Businesses

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

2017

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

2015 to 2016

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was somewhat below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2015 to 2016

Performance is consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2015 to 2016

Performance is consistent with 2017.

Community Development Lending

The institution is a leader in making CD loans.

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

HBUS originations of CD loans represent 31.2 percent of allocated tier 1 capital. Examples include:

- HBUS twice renewed a \$9 million revolving credit facility that capitalizes a community loan fund (CLF). The CLF provides loans for affordable housing, community facilities, and small businesses in low- and moderate-income communities in the Washington, DC and surrounding area.
- HBUS participated in a \$100 million syndicated revolving facility to a CDFI by providing \$5 million in financing. The CDFI provides acquisition, construction and permanent multifamily loans to nonprofit affordable housing developers that are members of the NeighborWorks America network.

Product Innovation and Flexibility

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

INVESTMENT TEST

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

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
DC MMSA	5	\$6,772	76	\$59,740	81	100	\$66,512	100	0	0

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

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

The combined prior and current period dollar volume represents 20.3 percent of allocated tier 1 capital. HBUS’s investments targeted affordable housing, a primary need in the DC MMSA.

A major investment included:

- HBUS invested \$15.1 million in a LIHTC project that will create 150 units of affordable housing in the AA. All units are restricted to households earning between 30 and 60 percent of AMI.

SERVICE TEST

The bank’s performance under the Service Test in the DC MMSA is rated Low Satisfactory.

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
DC MMSA	100	12	100	0	0	25	75	11.2	14.6	29.5	42.5

There are no branches in low- or moderate-income geographies; however, this is a direct result of the 2015 ACS Census update. The moderate-income geographies where three branches were located were reclassified as middle-income geographies.

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. Eight branches have Saturday hours and 11 branches have extended hours at least one day during the week.

Community Development Services

The bank provides a significant level of CD services.

HSBC employees provided 754 hours of service to 13 organizations within the AA that meet the definition of CD. Services primarily involve providing financial literacy and education to students and individuals in LMI persons located in LMI geographies. Other services involve providing board leadership for local non-profit organizations, participating in homebuyer’s workshops, and offering technical support for local non-profit organizations.

State Rating

State of California

CRA rating for the State of California⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was accessible to individuals of different income levels and essentially all portions of geographies in the AAs.
- The institution provides a relatively high level of CD services.

Description of Institution's Operations in California

HBUS has two AAs within California consisting of the Los Angeles-Long Beach-Anaheim MSA (LA MSA) in its entirety and a portion of the San Jose-San Francisco-Oakland, CA CSA (San Jose CSA) consisting of Alameda, San Francisco, San Mateo, and Santa Clara counties. HBUS operates 35 branches within the state with total deposits of \$10 billion, which represent 7.8 percent of the bank's adjusted deposits and a market share of 0.7 percent. Major competitors include Bank of America, Wells Fargo, and JP Morgan Chase Bank, each with substantially larger branch networks. These three banks combined have a 50.1 percent deposit market share.

Both the LA MSA and San Jose CSA are high-cost housing areas, limiting access to affordable home ownership among LMI borrowers. The median housing value of a single family home in the LA MSA and San Jose CSA is \$515,607 and \$707,125, respectively. The NAR 4Q2017 median sales price in the LA MSA ranged from \$550,800 (Los Angeles County) to \$780,000

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

(Orange County). In the San Jose CSA, the median sales price ranged from \$900,000 (San Francisco MSA) to \$1.2 million (San Jose MSA).

The poverty level across the AAs was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the LA MSA, the overall poverty level was 13 percent. However, in low-income geographies, the household poverty rate increases to 36 percent and in moderate-income geographies it increases to 23 percent. In middle- and upper-income geographies, the combined poverty level is 10 percent. In the San Jose CSA, the overall poverty level was 10 percent. In low-income geographies, the household poverty rate increases to 27 percent and in moderate-income geographies it increases to 14 percent. In middle- and upper-income geographies, the combined poverty level is 7 percent.

To understand the credit and community development needs in the area, OCC representatives primarily met with 14 community-based organizations for a listening session and also contacted three community organizations in the San Jose CSA and three organizations in the LA MSA. Participants noted a need for affordable housing, small business loans, financial literacy, and CDFI investments.

LA MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: LA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,929	9.1	28.0	25.9	35.1	1.8
Population by Geography	13,154,457	8.6	28.9	26.9	35.0	0.6
Housing Units by Geography	4,541,360	7.5	25.8	26.2	40.1	0.4
Owner-Occupied Units by Geography	2,082,030	2.7	17.6	27.5	52.2	0.1
Occupied Rental Units by Geography	2,190,392	12.0	33.7	25.1	28.4	0.7
Vacant Units by Geography	268,938	8.0	24.6	24.4	42.2	0.8
Businesses by Geography	978,267	5.0	19.4	25.4	48.2	1.9
Farms by Geography	10,497	3.6	18.6	28.1	48.9	0.8
Family Distribution by Income Level	2,913,538	24.4	16.3	17.0	42.3	0.0
Household Distribution by Income Level	4,272,422	25.6	15.5	16.1	42.8	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$86,003	Median Housing Value			\$515,607
Median Family Income MSA - 31084 Los Angeles-Long Beach- Glendale, CA MD		\$62,703	Median Gross Rent			\$1,353
			Families Below Poverty Level			13.0%
<i>Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

San Jose CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Jose CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,088	11.4	20.7	32.5	34.0	1.4
Population by Geography	5,042,626	10.7	21.6	34.3	32.9	0.4
Housing Units by Geography	1,892,562	10.5	20.0	34.1	34.8	0.6
Owner-Occupied Units by Geography	929,600	4.6	15.7	35.7	43.8	0.1
Occupied Rental Units by Geography	863,768	16.4	24.7	32.6	25.3	0.9
Vacant Units by Geography	99,194	15.2	18.8	31.7	33.1	1.2
Businesses by Geography	399,207	10.7	17.3	30.7	40.6	0.7
Farms by Geography	5,050	7.5	18.4	34.6	39.3	0.2
Family Distribution by Income Level	1,155,897	24.6	15.7	18.2	41.6	0.0
Household Distribution by Income Level	1,793,368	26.6	14.7	16.3	42.4	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$93,822	Median Housing Value			\$707,125
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$103,742	Median Gross Rent			\$1,588
Median Family Income MSA - 41940 San Jose-Sunnyvale-Santa Clara, CA MSA		\$107,126	Families Below Poverty Level			7.0%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in California

The LA MSA and the San Jose CSA each received a full-scope review. Each area represents a significant portion of the bank's operations in California. The LA MSA received slightly greater weight based on the proportion of the bank's lending and deposit concentration. Home mortgage lending received greater weight based on the volume of loan originations. The very high cost of housing and poverty levels in each of the AAs was considered in our evaluation under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

The bank’s performance under the Lending Test in California is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the LA MSA and San Jose CSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
LA MSA	5,136	2,291	0	22	7,449	63.6	60.9
San Jose CSA	3,102	1,138	0	26	4,266	36.4	39.1

Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State*	% State Deposits
LA MSA	\$2,945,947	\$81,280	0	\$117,039	\$3,144,266	55.4	60.9
San Jose CSA	\$2,381,240	\$44,383	0	\$108,640	\$2,534,263	44.6	39.1

LA MSA

Lending activity is excellent when considering the significant competition in the AA relative to the bank’s presence. HBUS had \$6.1 billion in deposits and ranked 16th with 1.2 percent market share. In HMDA lending, HBUS ranked 72nd with 0.3 percent market share. There are 936 home mortgage lenders in the AA. The top three lenders, Wells Fargo Bank with 8.6 percent, JPMorgan Chase Bank with 5.3 percent, and Bank of America with 4.1 percent have a combined market share of 18 percent. In small loans to businesses, HBUS ranked 21st with 0.3 percent market share. American Express led the market with 23.6 percent market share, followed by Chase Bank USA with 14.3 percent and Bank of America with 13.1 percent market share.

San Jose CSA

Lending activity is excellent when considering the significant competition in the AA relative to the bank’s presence. HBUS had \$3.9 billion in deposits and ranked 13th with a 0.8 percent market share. In HMDA lending, HBUS ranked 33rd with 0.6 percent market share. There are 751 home mortgage lenders in the AA. The top three lenders, Wells Fargo Bank with 12.5

percent, JPMorgan Chase Bank with 6.6 percent, and Bank of America with 6.5 percent have a combined market share of 25.6 percent. In small loans to businesses, HBUS ranked 15th with 0.5 percent market share. Chase Bank USA led the market with 20 percent market share, followed by American Express with 19.4 percent and Bank of America with 13.4 percent market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

LA MSA

2017

The proportion of loans in both LMI geographies exceeds the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017.

San Jose CSA

2017

The proportion of loans in both LMI geographies exceeds the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans.

2015 to 2016

In low-income geographies, performance was consistent with 2017. In moderate-income geographies, the proportion of loans was lower than the proportion of owner-occupied housing units in those geographies and consistent with the aggregate distribution of loans. This performance did not impact our overall conclusion.

Small Loans to Businesses

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

LA MSA

2017

The proportion of loans in low-income geographies exceeded and in moderate-income geographies significantly exceeded the proportion of businesses in those geographies. The bank exceeded in low- and significantly exceeded in moderate-income the aggregate distribution of loans.

2015 to 2016

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

San Jose CSA

2017

The proportion of loans in low-income geographies exceeded and in moderate-income geographies significantly exceeded the proportion of businesses in those geographies. The bank exceeded in low- and significantly exceeded in moderate-income the aggregate distribution of loans.

2015 to 2016

Performance in low-income geographies was consistent with 2017. In moderate-income geographies, the proportion of loans was near to the proportion of businesses and the aggregate distribution of loans in those geographies.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

LA MSA

2017

The overall borrower distribution of home mortgage loans reported in the AA is good, given the high cost of housing. The proportion of the bank's distribution of loans to low-income borrowers

was significantly below the proportion of low-income families, but significantly exceeded the aggregate distribution of loans. The proportion of the bank's distribution of loans to moderate-income borrowers was somewhat below with the percentage of moderate-income families and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance was consistent with 2017

San Jose CSA

2017

The overall borrower distribution of home mortgage loans reported in the AA is good, given the high cost of housing. The proportion of the bank's loans to low-income borrowers was significantly below the proportion of low-income families and significantly exceeded the aggregate distribution of loans. The bank's distribution of loans to moderate-income borrowers is consistent with the proportion of moderate-income families and significantly exceeded the aggregate distribution of loans.

2015 to 2016

Performance to low-income borrowers was consistent with 2017. The proportion of loans to moderate-income borrowers was slightly below the proportion of moderate-income families and significantly exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

LA MSA

2017

The distribution of loans to small businesses was below the proportion of small businesses but exceeded the aggregate distribution of loans.

2015 to 2016

The distribution of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

San Jose CSA

2017

The distribution of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2015 to 2016

Performance was generally consistent with 2017. The proportion of loans substantially met the aggregate distribution of loans.

Community Development Lending

The bank is a leader in making CD loans.

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

LA MSA

HBUS originations of CD loans represents 13.8 percent of allocated tier 1 capital. The loans supported a variety of community development purposes identified as community needs, including affordable housing, community services and economic development. One example includes:

- HBUS provided a \$22.5 million revolving credit facility to a nonprofit financial intermediary that lends to affordable housing developers in Los Angeles County.

San Jose CSA

HBUS originations of CD loans represents 19.9 percent of allocated tier 1 capital. The loans supported a variety of community development purposes identified as community needs, including affordable housing, community services and economic development.

Examples include:

- HBUS provided a \$4.8 million loan to fund the acquisition of a mixed use property in a low-income geography designated as a Community Benefit District. There are 16 housing units with rents affordable to LMI families and individuals.
- HBUS refinanced a \$3.1 million loan on three mixed use properties containing 56 residential units in San Francisco. All but three units are considered affordable.
- HBUS provided a \$3 million revolving loan to a nonprofit community loan fund. The fund provides capital to community development organizations. The fund also has a

wholly-owned subsidiary whose sole purpose is to conduct U.S. Small Business Administration SBA 7(a) lending activity.

Product Innovation and Flexibility

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

INVESTMENT TEST

The bank’s performance under the Lending Test in California is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance in the LA MSA and San Jose CSA is excellent.

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assess ment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
LA MSA	8	15,626	70	85,990	78	52.3	101,616	63.5	0	0
San Jose CSA	5	1,310	66	57,109	71	47.7	58,419	36.5	0	0

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

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

LA MSA

The combined prior and current period dollar volume represents 12 percent of allocated tier 1 capital. HBUS’s investments targeted affordable housing, a primary need in the LA MSA. The current period investments consisted of MBSs backed by mortgage loans to LMI borrowers.

San Jose CSA

The combined prior and current period dollar volume represents 10.7 percent of allocated tier 1 capital. HBUS’s investments targeted affordable housing, a primary need in the San Jose CSA. The current period investments consisted of MBSs backed by mortgage loans to LMI borrowers.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
LA MSA	60.9	21	60	4.8	23.8	9.5	57.1	8.6	28.9	26.9	35.0
San Jose CSA	39.1	14	40	21.4	7.1	28.6	42.9	10.7	21.6	34.3	32.9

In the LA MSA, the proportion of branches in low-income geographies is below the proportion of the population and in moderate-income geographies is near to the proportion of the population. In the San Jose CSA, the proportion of branches in low-income geographies significantly exceeds the proportion of the population. In moderate-income geographies, the proportion of branches is well below the proportion of the population.

Distribution of Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
LA MSA	2	2	0	0	0	0
San Jose CSA	NA	NA	NA	NA	NA	NA

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the LA MSA, the bank relocated both branches (one low- and one middle-income) within the same income designated geography early in the evaluation period. The branches were relocated to reduce occupancy expense. No branches were opened or closed in the San Jose CSA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Branch hours are extended on Thursdays. Additionally, in the LA MSA, seven branches have Saturday hours, with two branches located in moderate-income geographies. In the San Jose CSA six branches have Saturday hours, one of which is located in a low-income geography.

Community Development Services

The bank provides a relatively high level of CD services.

LA MSA

Four employees served as board or committee members for six different organizations. These organizations focused on affordable housing, economic development, and community services. Additionally, 62 HBUS employees provided 588 hours of service to 18 different organizations. Services primarily involve providing financial literacy and education to students and individuals in low- and moderate-income geographies.

San Jose CSA

One employee served on the board of an organization that provides community services to LMI individuals. Additionally, 44 HBUS employees provided 434 hours of service to seven different organizations. Services primarily involve providing financial literacy and education to students and individuals in low- and moderate-income geographies.

State of Florida

CRA rating for the State of Florida⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in making CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Florida

HSBC operates in each of the three MDs that comprise the Miami-Fort Lauderdale-West Palm Beach, FL MSA (Miami MSA). The AA consists of Miami-Dade, Broward, and Palm Beach counties in their entirety. This is the most populous MSA in Florida.

The bank had deposits of \$4.6 billion and ranked 19th in the state with 0.8 percent market share. The deposits represent 3.6 percent of the bank's adjusted deposits. Major competitors include Wells Fargo Bank, Bank of America, and JPMorgan Chase. Together these three banks have a combined market share of nearly 41 percent and each have significantly larger branch networks within the MSA.

The Miami MSA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value is \$227,861 and the NAR 4Q2017 median sales price of a single family home is \$330,000.

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

The poverty level across the AA was considered in our evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial wherewithal to qualify for a home loan than those with income above poverty. In the Miami MSA, the overall poverty level was 14 percent. However, in low-income geographies, the household poverty rate increases to 40 percent and in moderate-income geographies it increases to 24 percent. In middle- and upper-income geographies, the combined poverty level is just 11 percent.

To understand the credit and community development needs in the area, OCC representatives met with two community-based organizations during two in-person interviews. Participants noted a need for affordable owner-occupied and rental housing, preservation of affordable housing, and small business products.

Miami MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	797,472	4.2	21.8	28.2	44.6	1.2
Farms by Geography	12,328	4.6	24.0	29.5	41.5	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach, FL		\$61,809	Median Housing Value			\$227,861
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Gross Rent			\$1,194
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Delray Beach, FL MD		\$65,914	Families Below Poverty Level			13.5%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Florida

The Miami MSA received a full-scope review. Home mortgage loans received greater weight based on loan originations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank’s performance under the Lending Test in Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Miami-Fort Lauderdale-West Palm Beach MSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs, given competition and the bank’s market presence.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Miami MSA	2,317	1,511	1	17	3,846	100	100

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Miami MSA	682,858	100,149	400	313,600	1,097,007	100	100

HBUS ranked 11th in deposits with 2 percent market share. In overall HMDA lending, HBUS ranked 76th with 0.3 percent market share. While the bank’s mortgage lending market share is much lower than the bank’s deposit market share, this is a highly competitive market with 1,081 home lenders, including those without a depository presence. Wells Fargo Bank led the market with 8.7 percent market share and Quicken Loans ranked 2nd with 5.1 percent market share. In small loans to businesses, HBUS ranked 21st with 0.4 percent market share. There are 228 business lenders in the AA. American Express ranked 1st with 28.4 percent market share. Bank of America with 14.3 percent and Chase Bank USA with 9.9 percent rank 2nd and 3rd, respectively. Together, these three financial entities account for 52.6 percent market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

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

2015 to 2016

Performance in low-income geographies was inconsistent with 2017. The proportion of loans equaled the proportion of owner-occupied housing and exceeded the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017.

Small Loans to Businesses

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

2017

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

2015 to 2016

Performance in moderate-income geographies was inconsistent with 2017. The proportion of loans approximated the proportion of businesses and substantially met the aggregate distribution of loans. Performance in low-income geographies was consistent with 2017.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes. We considered the high cost of housing and the poverty level of the AA in reaching our conclusions.

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers was well below the proportion of families in the AA, but significantly exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of families and aggregate distribution of loans.

2015 to 2016

Performance to both low- and moderate-income borrowers was consistent with 2017.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses is below the proportion of small businesses in the AA and substantially exceeded the aggregate distribution of loans.

2015 to 2016

The proportion of loans to small businesses was well below the proportion of small businesses in the AA and substantially met the aggregate distribution of those loans.

Community Development Lending

The bank is a leader in making CD loans.

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

HBUS originations of CD loans represents 48.3 percent of allocated tier 1 capital. One example includes:

- HBUS provided a \$17.5 million loan to construct a building with eight retail units. The property is located in a moderate-income geography and will assist in creating permanent jobs for low- and moderate-income individuals.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Miami-Fort Lauderdale-West Palm Beach MSA is excellent.

HSBC has a significant level of qualified CD investments and grants and exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses complex investments to support CD initiatives.

Qualified Investments										
Assess ment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Miami MSA	10	12,791	74	58,935	84	100	71,726	100	1	1,641

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

The combined prior and current period dollar volume represents 11 percent of allocated tier 1 capital. HBUS’s investments targeted affordable housing, a primary need in the AA. The investments consisted of LIHTCs, MBSs backed by mortgage loans to LMI borrowers, and equity investments. Examples include:

- HBUS invested \$15 million in LIHTCs for the construction of an affordable senior housing complex consisting of 160 units in the Liberty City section of Miami.
- HBUS invested \$6 million in LIHTCs in an affordable housing complex consisting of 120 units in the Liberty City section of Miami. The units are available to families earning between 50 and 60 percent of the AMI.

SERVICE TEST

The bank’s performance under the Service Test in Florida is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Miami MSA	100	17	100	0	11.8	23.5	64.7	5.8	28.9	31.5	33.4

There are no branches in low-income geographies. In moderate-income geographies, the proportion of branches is well below the proportion of the moderate-income population.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
2	2	0	0	0	0

To the extent changes have been made, the bank opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Two branches located in upper-income geographies were closed due to expiring leases and reopened within the upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. Branches have extended hours Friday evenings. Additionally, seven branches, including the two moderate-income branches, have Saturday hours.

Community Development Services

The institution provides a relatively high level of CD services.

HSBC employees provided approximately 763 hours of service to 14 organizations within the AA that meet the definition of CD. Services primarily involve providing financial literacy and education to students and individuals in LMI persons located in LMI geographies. Other

services involve providing board leadership for local non-profit organizations, participating in homebuyer's workshops, and offering technical support for local non-profit organizations.

State Rating

State of Washington

CRA rating for the State of Washington⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AA.
- An excellent geographic distribution of both home mortgage loans and small loans to businesses.
- An excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made a relatively high level of CD loans.
- An excellent level of CD investments that were responsive to community needs.
- Branch distribution was reasonably accessible to individuals of different income levels and essentially all portions of geographies in the AA.
- The institution provides a significant level of CD services.

Description of Institution's Operations in Washington

The bank has delineated King County within the Seattle-Tacoma-Bellevue MSA (Seattle AA) as its AA. HSBC operated four branches within the AA. The bank's primary focus is commercial middle market businesses, given the port and trade opportunities in Seattle. The bank's deposits totaled \$767 million, or less than one percent of adjusted deposits and 0.9 percent deposit market share. Major competitors include Bank of America, Wells Fargo Bank, and JPMorgan Chase Bank, each with substantially larger branch networks. As noted in the demographic table that follows, the high housing value is a significant barrier in mortgage lending to low- and moderate-income persons. One community contact was made during the evaluation period with a CDFI. The representative indicated that opportunities include grants and lines of credit for CDFIs and nonprofits, debt financing for affordable housing developers, small business loans, and financial education.

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Seattle AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	398	5.0	20.1	38.7	35.4	0.8
Population by Geography	2,045,756	5.1	20.5	38.0	35.9	0.4
Housing Units by Geography	871,836	4.7	19.8	38.3	36.9	0.2
Owner-Occupied Units by Geography	470,632	2.7	15.2	40.4	41.7	0.0
Occupied Rental Units by Geography	349,019	7.4	25.6	35.8	30.7	0.5
Vacant Units by Geography	52,185	5.5	22.3	36.2	35.7	0.3
Businesses by Geography	168,467	5.3	16.3	34.7	43.1	0.6
Farms by Geography	3,101	3.4	14.4	41.2	40.9	0.2
Family Distribution by Income Level	488,006	21.0	16.4	19.5	43.1	0.0
Household Distribution by Income Level	819,651	24.2	15.6	17.0	43.2	0.0
Median Family Income MSA - 42644 Seattle-Bellevue-Everett, WA MD		\$92,317	Median Housing Value			\$410,534
			Median Gross Rent			\$1,241
			Families Below Poverty Level			7.0%
<i>Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Washington

The Seattle AA received a full-scope review. Mortgage lending received significantly greater weight based on the volume loan originations. The high housing cost was considered in our evaluation of performance under the Lending Test.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

The bank’s performance under the Lending Test in Washington is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Seattle AA	1,378	188	0	5	1,571	100	100
Dollar Volume of Loans (000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Seattle AA	\$610,630	\$12,636	0	\$11,050	\$634,316	100	100

HSBC has a limited presence in the AA. The bank ranked 15 of 46 banks operating in the AA with a 0.9 percent deposit market share. In overall home mortgage lending, the bank ranked 37 with a 0.6 percent market share. There are 587 mortgage lenders including many non-depository institutions in the AA, providing significant competition. The top three mortgage lenders and their individual market shares were Wells Fargo with 8.4 percent, Caliber Home Loans with 5.8 percent, and Homestreet Bank with 5.2 percent. In small business lending, the bank ranked with 0.21 Market share. The top three lenders have a combined market share of 50.4 percent. Bank of America led with 20.9 percent followed by American Express with 16.4 percent and Chase USA Bank with 13.1 percent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

2017

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

2015 to 2016

The proportion of loans in low-income geographies was slightly below than both the proportion of owner-occupied housing units in those geographies and the aggregate distribution of loans. The proportion of loans and aggregate distribution of loans in moderate-income geographies was consistent with 2017 performance.

Small Loans to Businesses

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

2017

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

2015 to 2016

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

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

2017

The proportion of loans to low-income borrowers is less than the proportion of low-income families within the AA, but significantly stronger than the aggregate distribution of loans. The bank was able to achieve 51 percent of the demographic comparator. The proportion of loans to moderate-income borrowers significantly exceeded both the proportion of low-income families within the AA and the aggregate distribution of loans.

2015 to 2016

Performance for lending to low-income borrowers was inconsistent with 2017. The proportion of loans to low-income borrowers was significantly less than the proportion of low-income families within the AA, but significantly exceeded the aggregate distribution of loans. Performance for lending to moderate-income borrowers was consistent with 2017 performance.

Small Loans to Businesses

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

2017

The proportion of loans to small businesses is comparable to the percentage of small businesses in the AA and stronger than the aggregate distribution of loans.

2015 to 2016

Performance was inconsistent with 2017. The proportion of loans to small businesses was substantially below than both the percentage of small businesses in the AA and the aggregate distribution of loans.

Community Development Lending

The institution has made a relatively high level of CD loans.

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

HBUS originated five loans totaling \$11.1 million or 10.3 percent of allocated tier 1 capital. One example is a \$5 million loan to a CDFI to capitalize a revolving loan fund for the purposes of economic development, community services and small business development in low- and/or moderate-income communities, including its AA. The loan was renewed once during the evaluation period.

Product Innovation and Flexibility

HSBC makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

HBUS has an excellent level of qualified CD investment and grants. The bank exhibits excellent responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Seattle AA	0	0	18	22,275	18	100	\$22,275	100	0	0

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

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

The combined current period dollar volume represents 20.8 percent of allocated tier 1 capital. HBUS's investments targeted affordable housing, a primary need in the Seattle AA. The investments consisted of MBSs backed by mortgage loans to LMI borrowers.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

HBUS has a very limited presence in the Seattle AA. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Seattle AA	100	4	100	0	0	3	1	5.1	20.5	38.0	35.9

Although there are no branches in low- or moderate-income geographies, this was a direct result of the 2015 ACS census. Previously, one branch that was located in a moderate-income geography is now located in a middle-income geography.

The bank did not open or close any branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. During 2017, branch hours were expanded to better meet customer needs.

Community Development Services

The bank provides a relatively high level of CD services, given the bank's very limited presence and available employees. During the evaluation period, HSBC employees provided 221 hours of CD service to three organizations that focus on financial literacy and affordable housing.

- One employee served on the loan committee of an organization that provides LMI borrowers with down payment assistance for home ownership and rescue loans to save homes from foreclosure.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2015 to 12/31/2016 (2010 Census), 12/31/2017 (2015 ACS Survey)	
Bank Products Reviewed:	Home mortgage, small business, community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA or State		
NY CSA	Full-scope	CT: Fairfield County NY: Bronx, Kings, Nassau, New York, Orange, Queens, Richmond, Rockland, Suffolk, Westchester Counties NJ: Bergen, Hudson, Middlesex, Morris, Union Counties
Philadelphia MMSA	Full-scope	PA: Philadelphia County DE: New Castle County
DC MMSA	Full-scope	DC: District of Columbia MD: Montgomery County VA: Alexandria, Arlington, Fairfax (City), Fairfax County, Falls Church City
California		
Los Angeles MSA	Full-scope	Los Angeles and Orange Counties
San Jose CSA	Full-scope	Alameda, San Francisco, San Mateo, Santa Clara
Florida		
Miami MSA	Full-Scope	Miami-Dade, Broward, and Palm Beach Counties
Washington		
Seattle AA	Full-scope	King County

Appendix B: Summary of MMSA and State Ratings

RATINGS HSBC Bank USA, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
HSBC Bank USA, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
NY CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
DC MMSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	Outstanding	Outstanding	Low Satisfactory	Outstanding
Washington	Outstanding	Outstanding	Low Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NY CSA	3,655	1,514,619	100.0	257,182	2.7	4.8	3.6	13.9	21.2	14.9	36.7	30.2	35.4	46.5	43.8	46.1	0.1	0.0	0.1
Total	3,655	1,514,619	100.0	257,182	2.7	4.8	3.6	13.9	21.2	14.9	36.7	30.2	35.4	46.5	43.8	46.1	0.1	0.0	0.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
NY CSA	3,655	1,514,619	100.0	257,182	25.6	3.3	3.0	15.6	16.5	11.5	17.2	22.9	20.0	41.6	55.7	51.6	0.0	1.6	13.9	
Total	3,655	1,514,619	100.0	257,182	25.6	3.3	3.0	15.6	16.5	11.5	17.2	22.9	20.0	41.6	55.7	51.6	0.0	1.6	13.9	

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY CSA	7,128	415,690	100.0	524,236	7.0	8.7	7.7	16.5	19.3	16.5	29.5	20.7	28.3	45.8	48.6	46.4	1.3	2.7	1.1
Total	7,128	415,690	100.0	524,236	7.0	8.7	7.7	16.5	19.3	16.5	29.5	20.7	28.3	45.8	48.6	46.4	1.3	2.7	1.1

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
NY CSA	7,128	415,690	100.0	524,236	85.8	61.0	49.1	7.0	39.0	7.2	0.0	
Total	7,128	415,690	100.0	524,236	85.8	61.0	49.1	7.0	39.0	7.2	0.0	
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NY CSA	7,692	3,149,419	100.0	283,944	2.4	2.9	2.6	13.7	13.0	13.1	37.7	34.2	35.2	46.2	49.8	49.1	0.0	0.1	0.0
Total	7,692	3,149,419	100.0	283,944	2.4	2.9	2.6	13.7	13.0	13.1	37.7	34.2	35.2	46.2	49.8	49.1	0.0	0.1	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NY CSA	7,692	3,149,419	100.0	283,944	24.3	3.6	2.6	16.3	14.8	10.4	18.2	23.9	19.3	41.2	54.9	52.9	0.0	2.8	14.8
Total	7,692	3,149,419	100.0	283,944	24.3	3.6	2.6	16.3	14.8	10.4	18.2	23.9	19.3	41.2	54.9	52.9	0.0	2.8	14.8

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NY CSA	10,670	992,104	100.0	546,282	6.5	6.5	6.6	17.4	16.3	16.8	30.7	26.4	30.6	44.0	46.2	44.7	1.4	4.6	1.3
Total	10,670	992,104	100.0	546,282	6.5	6.5	6.6	17.4	16.3	16.8	30.7	26.4	30.6	44.0	46.2	44.7	1.4	4.6	1.3

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NY CSA	10,670	992,104	100.0	546,282	85.6	55.6	42.3	7.1	40.5	7.4	3.9
Total	10,670	992,104	100.0	546,282	85.6	55.6	42.3	7.1	40.5	7.4	3.9

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
PA-DE MMSA	365	62,288	100.0	50,574	7.5	5.5	4.0	28.7	33.2	25.9	32.5	34.0	33.3	31.2	27.4	36.7	0.0	0.0	0.0
Total	365	62,288	100.0	50,574	7.5	5.5	4.0	28.7	33.2	25.9	32.5	34.0	33.3	31.2	27.4	36.7	0.0	0.0	0.0

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA-DE MMSA	365	62,288	100.0	50,574	27.6	8.2	7.4	17.8	29.0	15.7	17.8	25.5	18.8	36.7	37.3	38.9	0.0	0.0	19.1
Total	365	62,288	100.0	50,574	27.6	8.2	7.4	17.8	29.0	15.7	17.8	25.5	18.8	36.7	37.3	38.9	0.0	0.0	19.1

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
PA-DE MMSA	137	4,240	100.0	34,163	7.0	8.0	6.3	26.8	64.2	24.4	27.1	10.9	27.5	37.5	16.8	40.4	1.6	0.0	1.3
Total	137	4,240	100.0	34,163	7.0	8.0	6.3	26.8	64.2	24.4	27.1	10.9	27.5	37.5	16.8	40.4	1.6	0.0	1.3

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA-DE MMSA	137	4,240	100.0	34,163	85.1	83.9	49.5	5.7	16.1	9.2	0.0
Total	137	4,240	100.0	34,163	85.1	83.9	49.5	5.7	16.1	9.2	0.0

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
PA-DE MMSA	1,090	197,938	100.0	53,439	8.4	4.8	4.6	27.1	24.6	21.9	34.4	39.0	35.2	30.1	31.4	38.2	0.0	0.3	0.1
Total	1,090	197,938	100.0	53,439	8.4	4.8	4.6	27.1	24.6	21.9	34.4	39.0	35.2	30.1	31.4	38.2	0.0	0.3	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
PA-DE MMSA	1,090	197,938	100.0	53,439	27.4	9.0	6.2	17.7	26.5	14.7	18.6	22.6	18.4	36.3	40.2	38.3	0.0	1.7	22.4
Total	1,090	197,938	100.0	53,439	27.4	9.0	6.2	17.7	26.5	14.7	18.6	22.6	18.4	36.3	40.2	38.3	0.0	1.7	22.4

*Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
PA-DE MMSA	75	7,334	100.0	34,047	9.0	9.3	8.2	21.6	36.0	20.2	28.0	13.3	27.1	39.9	37.3	43.2	1.4	4.0	1.3
Total	75	7,334	100.0	34,047	9.0	9.3	8.2	21.6	36.0	20.2	28.0	13.3	27.1	39.9	37.3	43.2	1.4	4.0	1.3

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
PA-DE MMSA	75	7,334	100.0	34,047	85.0	53.3	46.5	5.7	44.0	9.3	5.6	
Total	75	7,334	100.0	34,047	85.0	53.3	46.5	5.7	44.0	9.3	5.6	
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
DC-VA-MD MMSA	780	211,518	100.0	100,737	4.6	11.8	6.5	11.3	24.2	12.7	31.3	34.1	32.7	52.5	29.2	47.7	0.3	0.6	0.5
Total	780	211,518	100.0	100,737	4.6	11.8	6.5	11.3	24.2	12.7	31.3	34.1	32.7	52.5	29.2	47.7	0.3	0.6	0.5

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
DC-VA-MD MMSA	780	211,518	100.0	100,737	21.4	14.9	6.0	14.6	36.2	15.8	18.3	25.5	21.2	45.7	23.5	43.9	0.0	0.0	13.1	
Total	780	211,518	100.0	100,737	21.4	14.9	6.0	14.6	36.2	15.8	18.3	25.5	21.2	45.7	23.5	43.9	0.0	0.0	13.1	

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
DC-VA-MD MMSA	287	9,100	100.0	82,749	4.6	10.1	4.0	13.3	19.9	13.8	30.6	27.9	31.2	50.6	41.8	50.4	1.0	0.3	0.5
Total	287	9,100	100.0	82,749	4.6	10.1	4.0	13.3	19.9	13.8	30.6	27.9	31.2	50.6	41.8	50.4	1.0	0.3	0.5

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
DC-VA-MD MMSA	287	9,100	100.0	82,749	83.3	41.5	54.8	6.9	58.5	9.8	0.0
Total	287	9,100	100.0	82,749	83.3	41.5	54.8	6.9	58.5	9.8	0.0

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
DC-VA-MD MMSA	1,019	505,968	100.0	133,690	4.6	9.9	5.7	15.8	24.0	16.5	32.0	33.2	31.4	47.6	32.9	46.4	0.0	0.0	0.0
Total	1,019	505,968	100.0	133,690	4.6	9.9	5.7	15.8	24.0	16.5	32.0	33.2	31.4	47.6	32.9	46.4	0.0	0.0	0.0

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
DC-VA-MD MMSA	1,019	505,968	100.0	133,690	20.9	9.5	4.9	15.3	30.8	13.2	18.8	26.2	20.0	45.0	32.0	43.5	0.0	1.5	18.4
Total	1,019	505,968	100.0	133,690	20.9	9.5	4.9	15.3	30.8	13.2	18.8	26.2	20.0	45.0	32.0	43.5	0.0	1.5	18.4

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
DC-VA-MD MMSA	229	18,391	100.0	94,004	4.9	3.1	4.0	16.6	10.0	16.7	28.2	24.9	29.0	49.9	62.0	50.2	0.4	0.0	0.1	
Total	229	18,391	100.0	94,004	4.9	3.1	4.0	16.6	10.0	16.7	28.2	24.9	29.0	49.9	62.0	50.2	0.4	0.0	0.1	

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
DC-VA-MD MMSA 2016	229	18,391	100.0	94,004	82.8	28.4	49.3	7.1	31.9	10.1	39.7
Total	229	18,391	100.0	94,004	82.8	28.4	49.3	7.1	31.9	10.1	39.7

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
LA CALIFORNIA	1,006	674,077	100.0	309,844	2.7	3.9	3.3	17.6	23.1	19.1	27.5	17.6	27.7	52.2	53.1	49.4	0.1	2.4	0.4
Total	1,006	674,077	100.0	309,844	2.7	3.9	3.3	17.6	23.1	19.1	27.5	17.6	27.7	52.2	53.1	49.4	0.1	2.4	0.4

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
LA CALIFORNIA	1,006	674,077	100.0	309,844	24.4	4.3	2.2	16.3	13.9	6.7	17.0	10.9	15.7	42.3	70.6	61.0	0.0	0.3	14.4
Total	1,006	674,077	100.0	309,844	24.4	4.3	2.2	16.3	13.9	6.7	17.0	10.9	15.7	42.3	70.6	61.0	0.0	0.3	14.4

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
LA CALIFORNIA	1,406	26,896	100.0	424,096	5.0	6.5	4.7	19.4	57.8	19.4	25.4	10.5	25.6	48.2	22.1	48.8	1.9	3.1	1.5
Total	1,406	26,896	100.0	424,096	5.0	6.5	4.7	19.4	57.8	19.4	25.4	10.5	25.6	48.2	22.1	48.8	1.9	3.1	1.5

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
LA CALIFORNIA	1,406	26,896	100.0	424,096	86.9	68.3	53.0	6.2	31.7	6.9	0.0	
Total	1,406	26,896	100.0	424,096	86.9	68.3	53.0	6.2	31.7	6.9	0.0	

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
LA CALIFORNIA	4,129	2,271,698	100.0	418,164	2.4	2.4	2.3	17.4	16.5	16.9	29.9	27.5	29.5	50.2	53.0	51.3	0.0	0.5	0.1
Total	4,129	2,271,698	100.0	418,164	2.4	2.4	2.3	17.4	16.5	16.9	29.9	27.5	29.5	50.2	53.0	51.3	0.0	0.5	0.1

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
LA CALIFORNIA	4,129	2,271,698	100.0	418,164	23.6	4.9	1.7	16.6	15.6	6.0	18.1	16.3	15.2	41.7	62.2	62.6	0.0	0.9	14.7
Total	4,129	2,271,698	100.0	418,164	23.6	4.9	1.7	16.6	15.6	6.0	18.1	16.3	15.2	41.7	62.2	62.6	0.0	0.9	14.7

*Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
LA CALI FORNIA	885	54,384	100.0	523,168	6.0	5.1	5.1	20.1	17.4	18.7	27.3	26.9	27.0	45.5	49.7	48.3	1.2	0.9	0.9
Total	885	54,384	100.0	523,168	6.0	5.1	5.1	20.1	17.4	18.7	27.3	26.9	27.0	45.5	49.7	48.3	1.2	0.9	0.9

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
LA CALIFORNIA	885	54,384	100.0	523,168	86.8	33.0	44.3	6.2	40.3	7.1	26.7
Total	885	54,384	100.0	523,168	86.8	33.0	44.3	6.2	40.3	7.1	26.7

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
San Jose-San Francisco CSA	918	699,297	100.0	127,939	4.6	9.4	6.2	15.7	23.1	18.4	35.7	24.5	36.2	43.8	42.5	38.9	0.1	0.5	0.3
Total	918	699,297	100.0	127,939	4.6	9.4	6.2	15.7	23.1	18.4	35.7	24.5	36.2	43.8	42.5	38.9	0.1	0.5	0.3

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
San Jose-San Francisco CSA	918	699,297	100.0	127,939	24.6	4.0	3.1	15.7	12.9	8.7	18.2	17.9	17.6	41.6	64.9	60.5	0.0	0.3	10.1
Total	918	699,297	100.0	127,939	24.6	4.0	3.1	15.7	12.9	8.7	18.2	17.9	17.6	41.6	64.9	60.5	0.0	0.3	10.1

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Jose - San Francisco CSA	802	21,222	100.0	154,483	10.7	15.3	9.9	17.3	42.3	17.9	30.7	6.0	32.5	40.6	36.2	39.2	0.7	0.2	0.6
Total	802	21,222	100.0	154,483	10.7	15.3	9.9	17.3	42.3	17.9	30.7	6.0	32.5	40.6	36.2	39.2	0.7	0.2	0.6

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Jose-San Francisco CSA	802	21,222	100.0	154,483	85.4	39.8	54.0	6.6	60.2	8.0	0.0
Total	802	21,222	100.0	154,483	85.4	39.8	54.0	6.6	60.2	8.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
San Jose-San Francisco CSA	2,184	1,681,943	100.0	196,968	4.9	5.2	5.6	15.5	13.7	16.6	39.6	32.1	39.7	40.0	48.9	38.1	0.0	0.0	0.0	
Total	2,184	1,681,943	100.0	196,968	4.9	5.2	5.6	15.5	13.7	16.6	39.6	32.1	39.7	40.0	48.9	38.1	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
San Jose-San Francisco CSA	2,184	1,681,943	100.0	196,968	24.0	6.5	2.2	16.3	13.6	8.2	18.8	10.5	17.9	40.9	68.2	61.7	0.0	1.2	10.0	
Total	2,184	1,681,943	100.0	196,968	24.0	6.5	2.2	16.3	13.6	8.2	18.8	10.5	17.9	40.9	68.2	61.7	0.0	1.2	10.0	

Source: 2010 U.S Census 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Jose -San Francisco CSA	336	23,161	27.5	211,941	12.4	15.2	9.5	17.0	15.8	17.4	32.8	22.9	35.5	37.8	46.1	37.5	0.1	0.0	0.0
Total	336	23,161	27.5	211,941	12.4	15.2	9.5	17.0	15.8	17.4	32.8	22.9	35.5	37.8	46.1	37.5	0.1	0.0	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
San Jose-San Francisco CSA	336	23,161	100.0	211,941	85.4	35.4	39.0	6.6	34.8	8.1	46.9	
Total	336	23,161	100.0	211,941	85.4	35.4	39.0	6.6	34.8	8.1	46.9	
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami MSA	399	142,221	100.0	140,541	2.6	2.0	2.3	23.2	24.6	20.5	32.9	24.6	34.1	41.2	47.9	42.8	0.2	1.0	0.4
Total	399	142,221	100.0	140,541	2.6	2.0	2.3	23.2	24.6	20.5	32.9	24.6	34.1	41.2	47.9	42.8	0.2	1.0	0.4

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	399	142,221	100.0	140,541	23.1	6.8	2.6	17.0	18.3	10.6	17.7	16.8	18.9	42.2	55.4	50.9	0.0	2.8	17.0
Total	399	142,221	100.0	140,541	23.1	6.8	2.6	17.0	18.3	10.6	17.7	16.8	18.9	42.2	55.4	50.9	0.0	2.8	17.0

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Miami MSA	881	33,321	100.0	226,331	4.2	11.5	4.6	21.8	39.2	21.4	28.2	14.5	27.3	44.6	33.6	45.5	1.2	1.2	1.2
Total	881	33,321	100.0	226,331	4.2	11.5	4.6	21.8	39.2	21.4	28.2	14.5	27.3	44.6	33.6	45.5	1.2	1.2	1.2

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	881	33,321	100.0	226,331	91.0	75.3	52.9	3.9	24.7	5.1	0.0
Total	881	33,321	100.0	226,331	91.0	75.3	52.9	3.9	24.7	5.1	0.0

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami MSA	1,918	540,637	100.0	145,423	2.1	2.1	1.2	23.1	25.4	16.8	36.3	34.8	36.9	38.6	37.4	45.0	0.0	0.3	0.1
Total	1,918	540,637	100.0	145,423	2.1	2.1	1.2	23.1	25.4	16.8	36.3	34.8	36.9	38.6	37.4	45.0	0.0	0.3	0.1

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	1,918	540,637	100.0	145,423	22.4	6.4	2.2	17.3	27.9	9.6	18.9	17.5	17.6	41.3	46.5	53.7	0.0	1.7	16.8
Total	1,918	540,637	100.0	145,423	22.4	6.4	2.2	17.3	27.9	9.6	18.9	17.5	17.6	41.3	46.5	53.7	0.0	1.7	16.8

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Miami MSA	630	66,828	100.0	242,848	3.4	3.2	3.2	21.8	18.7	20.5	30.3	20.3	28.5	43.7	55.9	46.8	0.9	1.9	0.9
Total	630	66,828	100.0	242,848	3.4	3.2	3.2	21.8	18.7	20.5	30.3	20.3	28.5	43.7	55.9	46.8	0.9	1.9	0.9

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	630	66,828	100.0	242,848	90.7	41.1	48.5	3.8	52.2	5.5	13.2
Total	630	66,828	100.0	242,848	90.7	41.1	48.5	3.8	52.2	5.5	13.2

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Seattle AA	544	183,789	100.0	76,323	2.7	3.5	2.8	15.2	26.8	16.8	40.4	38.8	41.9	41.7	30.5	38.4	0.0	0.4	0.0
Total	544	183,789	100.0	76,323	2.7	3.5	2.8	15.2	26.8	16.8	40.4	38.8	41.9	41.7	30.5	38.4	0.0	0.4	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Seattle AA	544	183,789	100.0	76,323	21.0	10.7	3.8	16.4	28.7	14.1	19.5	20.2	21.6	43.1	40.1	51.6	0.0	0.4	8.9	
Total	544	183,789	100.0	76,323	21.0	10.7	3.8	16.4	28.7	14.1	19.5	20.2	21.6	43.1	40.1	51.6	0.0	0.4	8.9	

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Seattle AA	113	5,476	100.0	52,505	5.3	20.4	5.4	16.3	47.8	16.0	34.7	15.9	35.4	43.1	14.2	42.6	0.6	1.8	0.6
Total	113	5,476	100.0	52,505	5.3	20.4	5.4	16.3	47.8	16.0	34.7	15.9	35.4	43.1	14.2	42.6	0.6	1.8	0.6

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Seattle AA	113	5,476	100.0	52,505	85.4	77.0	50.4	5.9	23.0	8.8	0.0	
Total	113	5,476	100.0	52,505	85.4	77.0	50.4	5.9	23.0	8.8	0.0	
<p><i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i></p>												

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Seattle AA	834	426,841	100.0	95,112	1.7	1.6	1.8	13.2	14.5	12.7	47.3	41.0	47.9	37.7	42.9	37.6	0.0	0.0	0.0
Total	834	426,841	100.0	95,112	1.7	1.6	1.8	13.2	14.5	12.7	47.3	41.0	47.9	37.7	42.9	37.6	0.0	0.0	0.0

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Seattle AA	834	426,841	100.0	95,112	20.0	6.6	3.4	16.9	19.3	12.5	21.1	20.6	20.4	42.0	52.3	53.0	0.0	1.2	10.7		
Total	834	426,841	100.0	95,112	20.0	6.6	3.4	16.9	19.3	12.5	21.1	20.6	20.4	42.0	52.3	53.0	0.0	1.2	10.7		

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Seattle AA	75	7,160	131.6	73,282	5.2	2.7	4.5	14.8	5.3	13.8	42.9	64.0	43.9	36.9	28.0	37.7	0.2	0.0	0.0
Total	75	7,160	131.6	73,282	5.2	2.7	4.5	14.8	5.3	13.8	42.9	64.0	43.9	36.9	28.0	37.7	0.2	0.0	0.0

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

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Seattle AA	75	7,160	100.0	73,282	86.1	13.3	39.5	5.6	77.3	8.3	12.3
Total	75	7,160	100.0	73,282	86.1	13.3	39.5	5.6	77.3	8.3	12.3

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