



PUBLIC DISCLOSURE

March 27, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank
Charter Number: 14695

555 South Flower Street
Los Angeles, CA 90071

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.

This document was updated on May 6, 2024, to include corrections to tables and footnotes.

Contents

Overall CRA Rating	3
Lending in Assessment Area	4
Description of Institution.....	4
Scope of the Evaluation.....	5
Evaluation Period/Products Evaluated.....	5
Description of Factors Considered Under Each Performance Test.....	5
Selection of Areas for Full-Scope Review.....	7
Ratings.....	7
Flexible and Innovative Lending Products	8
Other Information.....	8
COVID-19 Efforts.....	9
Discriminatory or Other Illegal Credit Practices Review	10
Multistate Metropolitan Statistical Area Rating	11
Washington-Arlington-Alexandria, DC-VA-MD-WV (Washington) MMSA	11
State Ratings.....	19
State of California.....	19
State of Florida	31
State of Georgia.....	39
State of Minnesota.....	47
State of Nevada	55
State of New York.....	64
State of Tennessee.....	73
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated Needs to Improve.

The following table indicates the performance level of City National Bank (CNB or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	City National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			
Low Satisfactory			
Needs to Improve	X		X
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 bank’s overall Needs to Improve CRA rating is based on a Needs to Improve Lending Test rating.¹
- The Lending Test rating is based on the Needs to Improve ratings in three rating areas, two of which (the states of California and New York) received the most weight due to the concentration of deposits within those areas. The lending test rating for the Los Angeles Combined Statistical Area (CSA) was lowered from “Satisfactory” to “Needs to Improve” as a result of the extent and nature of evidence of discriminatory and illegal credit practices, as described in the Discriminatory or Other Illegal Credit practices section of this document. Please refer to the Discriminatory or Other Illegal Credit Practices Review section of this report for more information.
- The Investment Test rating is based on each of the eight rating areas receiving an Outstanding rating based on the volume of investments. CNB displayed excellent responsiveness to community needs in all rating areas, except for the state of Nevada.
- The Service Test rating is based on three of the eight rating areas, including the bank’s two largest rating areas (the states of California and New York) receiving Needs to Improve ratings. Four rating areas received Low Satisfactory ratings while one rating area received a High Satisfactory rating.

¹ § 25.28 Assigned ratings. (3) No bank may receive an assigned rating of "satisfactory" or higher unless it receives a rating of at least "low satisfactory" on the lending test.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AAs).

The bank originated and purchased 85.8 percent of its total loans inside the bank's assessment areas during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This had a positive impact on the geographic distribution of lending by income level of the geography.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2019	4,101	79.4	1,064	20.6	5,165	4,467,772	82.3	960,606	17.7	5,428,378
2020	3,549	73.2	1,297	26.8	4,846	4,471,323	76.7	1,356,533	23.3	5,827,856
2021	5,492	74.6	1,874	25.4	7,366	6,539,760	76.7	1,981,286	23.3	8,521,046
Subtotal	13,142	75.6	4,235	24.4	17,377	15,478,855	78.3	4,298,425	21.7	19,777,280
Small Business										
2019	2,997	91.7	270	8.3	3,267	657,572	90.6	68,078	9.4	725,650
2020	14,872	91.4	1,405	8.6	16,277	2,377,294	89.5	278,158	10.5	2,655,452
2021	10,166	92.0	882	8.0	11,048	1,555,436	91.4	147,176	8.6	1,702,612
Subtotal	28,035	91.6	2,557	8.4	30,592	4,590,302	90.3	493,412	9.7	5,083,714
Total	41,177	85.8	6,792	14.2	47,969	20,069,157	80.7	4,791,837	19.3	24,860,994
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

City National Bank is an interstate financial institution headquartered in Los Angeles, California. CNB is a wholly owned subsidiary of RBC USA Holdco Corporation (RBC-USA), a holding company headquartered in New York, New York. RBC-USA is an intermediate bank holding company (BHC) wholly owned by RBC US Group Holdings LLC, an intermediate BHC ultimately wholly owned by the Royal Bank of Canada, a Canadian-chartered bank.

CNB is a full-service banking institution with operations in California, Florida, Georgia, Minnesota, Nevada, New York, Tennessee, Virginia, and the District of Columbia. CNB is a relationship-driven bank, focused on providing business clients with complete banking solutions. CNB has a large wealth management portfolio that offers numerous investment options and platforms. The bank's primary focus is business lending and commercial banking. CNB offers commercial loans as well as small business loans through the Small Business Administration (SBA). CNB offers limited unsecured consumer loan products as an accommodation for business and wealth management customers. Since its last evaluation, CNB expanded its residential mortgage lending program and significantly increased its mortgage lending during this evaluation period.

CNB had total assets of \$93.2 billion as of December 31, 2021. This includes total loans and leases of \$57.1 billion that consisted of \$10.3 billion (18.2 percent of loans and leases) in commercial loans, \$32.1 billion in real-estate related loans (56.3 percent), \$13.6 billion (24 percent) in other loans, and \$900 million (1.6 percent) in loans to individuals. Total tier 1 capital as of December 31, 2021, was \$6.8 billion. CNB originated or purchased \$19.8 billion in mortgage loans and \$5.1 billion in small business loans during the evaluation period. Of that, CNB originated or purchased \$15.5 billion in mortgage loans and \$4.6 billion in small business loans

within its assessment areas. CNB purchases loans from PennyMac, a national home mortgage lender and servicer.

Through the COVID-19 pandemic, the bank saw substantial deposit growth, with total deposits increasing from \$49.6 billion as of December 31, 2019, to \$82.9 billion, as of December 31, 2021. This represents a 67.1 percent increase in deposits over the course of the pandemic.

As of December 31, 2021, CNB operated 74 branch locations and 75 Automated Teller Machines (ATMs), of which 73 were deposit taking. CNB operated within eight rating areas that include one Multistate Metropolitan Statistical Area (MMSA), in which the bank operates in two or more states, and seven states. There were twelve total AAs within the eight rating areas. The bank's operations are primarily centered in the state of California and further concentrated in the Los Angeles CSA.

There were no identified legal, financial, or other factors that impeded the bank's ability to help meet the credit, investment, and service needs of its AAs during the evaluation period.

The OCC assigned CNB an overall Satisfactory rating in its last CRA evaluation dated August 14, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large retail bank Lending, Investment, and Service tests. The evaluation period is January 1, 2019, to December 31, 2021.

In March 2020, the United States (U.S.) began to face a pandemic from the coronavirus disease of 2019 (COVID-19) that resulted in economic uncertainties, including business shutdowns and increased unemployment. The federal government instituted several programs and initiatives to assist businesses and individuals, including the Payroll Protection Program (PPP), mortgage foreclosure and eviction protection programs, and extended unemployment benefits. OCC examiners considered the bank's participation in addressing community and customer needs during the COVID-19 pandemic for all AAs in the Lending, Investment, and Service Tests of this evaluation.

Description of Factors Considered Under Each Performance Test

Lending Test

In evaluating the bank's lending performance, the OCC reviewed and evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses reported under the Community Reinvestment Act (CRA), and Community Development (CD) loans. The bank did not originate or purchase a sufficient volume of small loans to farms to conduct a meaningful analysis. CNB did not elect to have consumer loans considered during this CRA evaluation and consumer loans do not constitute a significant majority of lending. Examiners considered loans made by the bank under the SBA's PPP as either small loans to businesses under the borrower and geographic distribution of lending analysis, or as CD loans, depending on loan size.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans within an AA, the OCC gave greater weight to CNB's 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 in that AA. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level and

housing affordability in the full-scope AAs to determine if low- and moderate-income (LMI) households would be challenged to afford homes. Within each performance test (borrower and geographic distributions), examiners placed greater weight on the bank's performance as compared to the area demographics, versus the aggregate peer performance, as the demographics reflect the entire evaluation period, while aggregate data is based only on one year of data.

The OCC also considered the volume of CD loans and the degree of responsiveness of those loans to the needs in the community. To provide perspective regarding the relative level of qualified CD lending, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The level of CD lending in each AA had a positive, neutral, or negative effect on the rating area's lending test, as applicable.

To assess the bank's lending activity in each AA, the OCC compared the bank's market share and rank of loans using peer loan data to its market share and rank in deposits using FDIC deposit market share data as of June 30, 2021. Deposit market share data includes deposit data for FDIC-insured institutions such as banks and savings and loan associations but not credit unions. For both mortgage and small loans to businesses, the OCC utilized market share reports as of 2021.

CNB originated a substantial volume of PPP loans during the evaluation period. Between 2020 and 2021, the bank originated more than 23,000 PPP loans totaling \$3.1 billion that were considered as part of the Lending Test as small loans to businesses. For 55 percent of these PPP loans, CNB did not collect revenue information as revenue information was not a requirement of the PPP lending program. As a result, CNB had a substantially higher volume of small business loans with revenues not reported in each of its full-scope assessment areas. Interagency guidance² states, *"When evaluating CRA performance, the agencies will take into account the unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency and will not penalize a bank for making a large volume of loans for which gross annual revenue information is not available."* To fully consider the bank's lending patterns within the context of the PPP program, OCC examiners analyzed bank performance including and excluding PPP loans for which revenue was unavailable or uncollected. This performance context generally resulted in more positive performance when considering the Distribution of Loans by Income Level of the Borrower for small businesses in most assessment areas. The impact of this analysis is described in the Lending Test section of each full-scope assessment area. CNB originated an additional 113 PPP loans, totaling \$165.7 million, that received consideration as CD loans.

CNB originated 11 CD loans totaling \$215.9 million, totaling 3.16 percent of total tier 1 capital, to organizations and projects with a nationwide footprint that do not directly benefit the bank's AAs but have a purpose, mandate, or function to benefit those AAs. These loans could not be allocated to individual AAs and were considered in the Lending Test at the institution level.

Investment Test

The OCC's analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as its primary purpose. Qualified investments include investments that met the definition of CD and were made prior to the current evaluation period and were still outstanding or were made during the current evaluation period. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount. To provide perspective regarding the relative level of qualified investments, examiners allocated a portion of the bank's tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The OCC also considered the responsiveness of investments to the needs of the communities, the complexity of investments, and whether the bank acted in a leadership position. The bank

² Community Reinvestment Act (CRA) Frequently Asked Questions Related to COVID-19: [Community Reinvestment Act \(CRA\) Frequently Asked Questions Related to COVID-19 \(occ.gov\)](https://www.occ.gov/news-issuances/press-releases/2020/09/09-cra-faq-covid-19)

utilized Low-Income Housing Tax Credits (LIHTC) and New Market Tax Credits (NMTC) as well as investments in Small Business Investment Companies (SBIC) and Community Development Financial Institutions (CDFI) within its AAs.

Service Test

The OCC gave primary consideration to CNB's performance in delivering retail products and services to geographies and individuals of different income levels through the distribution of branches. The OCC focused on branches in LMI geographies. In instances where there were few branches in a full-scope AA, examiners considered performance context, including the presence of ATMs, hours of operation at the branch and ATMs, and geographic distribution of lending to arrive at their conclusions. Branch openings and closures were limited during the evaluation period and did not materially impact Service Test ratings. The OCC evaluated the range of products and services offered by CNB 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 (MUI) geographies. While the bank offers multiple alternative delivery systems commensurate with standard industry offerings including ATMs, telephone banking, online banking (OLB), electronic bill-pay, remote deposit capture, and mobile banking options, examiners did not consider these systems in aggregate as there was insufficient data to determine their effectiveness in targeting LMI individuals or geographies. The vast majority of ATMs are located at branch locations and no additional analysis related to the distribution of ATMs was conducted. The OCC further evaluated CNB's record of providing CD services. The 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 and/or were most impactful to the AA.

Selection of Areas for Full-Scope Review

In each state where the bank has a branch office, one AA within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated AAs located within the same metropolitan statistical area (MSA), MMSA, or CSA are combined and evaluated as a single AA. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs and the counties that comprise each AA.

Ratings

The bank's overall rating is a blend of the state ratings and the MMSA rating. The Performance Evaluation (PE) begins with the MMSA rating area followed by each state in alphabetical order.

The MMSA rating is based on the bank's performance within that MMSA. State ratings are based primarily on conclusions in the AA reviewed using full-scope procedures while also considering performance in the limited-scope AAs, as applicable.

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

The geographic and borrower distribution conclusions were weighted according to the proportion of HMDA and loans to small businesses in each AA. Refer to the scope section of each full-scope AA for a discussion of which category of loan was weighted more heavily for that specific AA. The loan distribution analyses compared HMDA loans and small loans to businesses to demographic and aggregate data under the applicable

lending test components.

In arriving at overall conclusions, the state of California received the most consideration, as this rating area accounted for 82.1 percent of the bank's total lending, 86.2 percent of total deposits, and 73 percent of total branches. The state of New York, which represented 9.8 percent of total lending and 8.8 percent of deposits, and the state of Nevada, which represented 2.9 percent of total lending and 2.8 percent of total deposits were also given more consideration based on the volume of deposits and lending in relation to the remaining rating areas.

In the New York MSA, bank deposit totals were adjusted to exclude consideration of \$9.6 billion in non-local, non-retail deposits consisting of external sweep accounts³ utilized by customers of RBC Wealth Management that were unrelated to CNB's retail banking operations. RBC Wealth Management is an operating division of RBC Capital Markets, LLC, a subsidiary of RBC-USA. The adjusted deposit total and the discussion on the impact to deposit market share are discussed in the narrative description of operations for the New York MSA AA. The evaluation of CD lending and CD investments both considered the deposit adjustment in arriving at performance conclusions. Subsequently, while CNB had total deposits of \$75.4 billion as of June 30, 2021, capital was allocated across the bank's AAs as if the bank had \$65.8 billion in total deposits.

Flexible and Innovative Lending Products

CNB made use of several flexible and innovative lending products. These include SBA 504 loans, SBA 7(a) standard, express, and real estate loans, and participation in the California State Guarantee Loan Program. Across all AAs, CNB originated 398 flexible or innovative loans totaling \$560.8 million during the evaluation period. CNB also originated a substantial number of PPP loans.

Other Information

Deposit Market Share - The OCC used summary deposit data reported to the FDIC as of June 30, 2021. This was the most recent public data available during the evaluation period.

Lending Market/Peer Data –The OCC used 2021 peer mortgage data and 2021 peer small loans to businesses data reported to the Federal Financial Institutions Examination Council (FFIEC).

Lending Gap Analysis – Summary reports and maps were reviewed, and lending activity of home mortgage loans and small loans to business were analyzed over the evaluation period to identify any unexplained and conspicuous gaps in the geographic distribution of loans in each full-scope AA. The presence of conspicuous and unexplained gaps in an AA is factored into the conclusions regarding the geographic distribution of lending by income level of geography and can result in a more adverse assessment of the geographic distribution. Similarly, the absence of lending gaps does not necessarily indicate an adequate or better assessment of the geographic distribution of loans.

June 2020 CRA Rule – On June 5, 2020, the OCC published a modernized CRA Rule⁴ The Rule was subsequently rescinded⁵ on December 14, 2021. The Rule was in effect from October 1, 2020, until December 31, 2021. While in force, the Rule broadened the scope of activities⁶ that qualified as CD loans, investments, and services and allowed banks to receive CRA credit for activities outside of its AAs and broader statewide and regional areas (BSRA)⁷. An activity that met these qualifying criteria under the June 2020 CRA rule conducted between October 1, 2020, and December 31, 2021, remained a qualifying activity even after

³ 12 CFR § 360.8(4) - A sweep account is an account held pursuant to a contract between an insured depository institution and its customer involving the pre-arranged, automated transfer of funds from a deposit account to either another account or investment vehicle located within the depository institution (internal sweep account), or an investment vehicle located outside the depository institution (external sweep account).

⁴ [Community Reinvestment Act Regulations: A Rule by the Comptroller of the Currency on 06/05/2020](#)

⁵ [Community Reinvestment Act: Final Rule to Rescind and Replace Community Reinvestment Act Rule Issued in 2020](#)

⁶ 12 CFR § 25.04 - Qualifying activities criteria

⁷ 12 CFR § 25.13 - General performance standards and presumptive rating

rescission of the June 2020 CRA rule and received consideration in this evaluation.

Unemployment rate – In most cases, unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics (BLS). Nationally, the unemployment rate in January 2019 was 4 percent while the unemployment rate in December 2021 was 3.9 percent. Pandemic-related unemployment peaked at 14.7 percent in April 2020.

COVID-19 Efforts

The worldwide COVID-19 pandemic had a significant impact on the housing market, resulting in increased demand for housing, increased housing prices on a nationwide basis, and increased demand for mortgages. According to Federal Reserve Economic Data⁸ (FRED), 30-year interest rates declined to approximately 2.7 percent as of January of 2021 from approximately 4.5 percent as of January of 2019. Per FRED, the median home price for houses sold in the United States increased substantially because of increased demand and lower borrowing costs pushing the median national home sale price from \$313,000 in January of 2019 to \$423,000 in January of 2022, a 38 percent increase in three years. The median ‘Days on Market’ declined from 87 in January 2019 to a pandemic-low of 36 in June of 2021. At the same time, the supply of new homes declined from 6.9 months in January of 2019 to a pandemic-low of 3.3 months in August of 2020, before increasing to 5.6 months by December of 2021. These factors combined to make available housing more scarce and less affordable, especially for LMI households.

Further, per the Department of Health and Human Services, Office of Human Services Policy “In 2020, the COVID-19 pandemic and associated recession amplified preexisting employment inequalities. Low-wage workers lost jobs at five times the rate of middle-wage workers, while high-wage employment increased over the first year of the pandemic” further exacerbating LMI households’⁹ ability to obtain credit or purchase homes.

COVID-19 Consumer Debt Relief – In response to the COVID-19 pandemic, the bank instituted a 90-day payment deferral program for customers who submitted a hardship letter. CNB deferred 974 mortgage loans and home equity lines of credit totaling \$1.1 billion for three months, and an additional 496 mortgages and home equity lines of credit totaling \$621 million for an additional three months.

⁸ <https://fred.stlouisfed.org/>

⁹ [The Impact of the First Year of the COVID-19 Pandemic and Recession on Families With Low Incomes](#)

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), in determining a national bank 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 (DOJ), the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau, as applicable.

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

On January 12, 2023, the DOJ filed a complaint alleging that CNB violated the Equal Credit Opportunity Act and the Fair Housing Act by engaging in unlawful redlining in Los Angeles County by avoiding providing credit services to majority-Black and Hispanic neighborhoods because of the race, color, and national origin of the people living in those neighborhoods during the period 2017-2020. CNB agreed to resolve these allegations with a consent order, but denied the allegations in the complaint. As part of the consent order, CNB agreed to invest \$29.5 million in a loan subsidy fund for residents of majority-Black and Hispanic neighborhoods in Los Angeles County, \$500,000 in advertising and outreach towards residents of these neighborhoods, \$500,000 for consumer financial education, and \$750,000 towards community development partnerships to provide services that increase access to residential mortgage credit. CNB also agreed to conduct a Community Credit Needs Assessment to identify needs for financial services in majority-Black and Hispanic census tracts, open one new branch in a majority-Black and Hispanic neighborhood, ensure four mortgage loan officers are dedicated to serve majority-Black and Hispanic neighborhoods, and employ a Community Lending Manager to oversee continued development of lending in these neighborhoods. On January 30, 2023, the court entered the final consent order.¹⁰

As a result of these findings, and after consideration of the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information, the OCC lowered the Lending Test rating for the state of California from Low Satisfactory to Needs to Improve, and consequently, the overall rating for the bank is Needs to Improve. In lowering CNB's rating, the OCC gave weight to the nature and strength of the evidence DOJ described, the importance of CNB's Los Angeles market to its overall operations, and CNB's failure of controls to prevent and proactively address the issues DOJ identified.

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

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

¹⁰ U.S. vs. City National Bank, Consent Order, Case No. 2:23-00204-DMG (RAOx) (C.D. Cal., Jan. 30, 2023).

Multistate Metropolitan Statistical Area Rating

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

CRA rating for the Washington MMSA: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good lending performance based on a good geographic distribution of loans, a poor borrower distribution of loans, excellent responsiveness when considering lending activity, and leadership in making CD loans, which had a positive effect on the Lending Test rating.
- Excellent investment performance based on an excellent level of investments and donations and responsiveness to identified needs for affordable housing.
- Adequate service performance based on reasonably accessible service delivery systems and a relatively high level of CD services.

Description of Institution's Operations in Washington MMSA

CNB opened a branch in Fairfax County, Virginia in August of 2020. This expanded the Washington, DC rating area into an MMSA rating area.

CNB delineated two AAs within the Washington MMSA that were combined for analysis and presentation purposes. They include the entirety of the District of Columbia and Fairfax County, Virginia. Refer to Appendix A for a list of the counties reviewed.

CNB had \$258.5 million in deposits in the Washington MMSA representing 0.4 percent of the bank's total deposits as of June 30, 2021, and this MMSA was CNB's sixth largest rating area based on deposits. As of December 31, 2021, the bank operated two branches and two ATMs, both of which were deposit-taking, within the rating area, representing 2.7 percent of total bank branches and total ATMs. The bank originated and purchased approximately \$256.9 million in home mortgage and small business loans within the Washington MMSA, representing 1.3 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 49 FDIC-insured institutions operating 493 branches in the AA. CNB ranked 27th in deposit market share with 0.2 percent. The top three banks by deposit market share are Capital One, National Association with 17.4 percent, Wells Fargo Bank, National Association with 16.2 percent, and Bank of America, National Association with 16 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Washington MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	437	14.9	12.1	29.5	41.2	2.3
Population by Geography	1,776,206	13.2	11.9	30.9	42.6	1.5
Housing Units by Geography	713,275	13.8	11.9	30.5	42.6	1.1
Owner-Occupied Units by Geography	378,443	5.7	9.1	31.4	53.4	0.4
Occupied Rental Units by Geography	287,302	22.7	15.2	30.0	30.1	2.0
Vacant Units by Geography	47,530	24.8	13.5	27.3	33.0	1.3
Businesses by Geography	229,976	5.1	11.3	33.3	49.1	1.3
Farms by Geography	2,316	4.3	8.2	36.1	50.8	0.6
Family Distribution by Income Level	398,747	21.7	14.0	18.0	46.3	0.0
Household Distribution by Income Level	665,745	24.1	14.4	17.2	44.3	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$106,105	Median Housing Value			\$497,534
			Median Gross Rent			\$1,551
			Families Below Poverty Level			7.1%
<i>Source: 2015 ACS and 2021 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>						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Washington MMSA was \$106,105. Based on this information low-income families earned less than \$53,053 and moderate-income families earned less than \$84,884. The median housing value in the AA is \$497,534 while the National Association of Realtors (NAR) median sales price of a single-family home was \$440,900 in calendar year 2019 and increased to \$544,300 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,326 for a low-income borrower and \$2,122 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$2,671. LMI borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial resources to qualify for a home loan than those with income above the poverty. In the Washington MMSA, the overall family poverty level was 7.1 percent.

Economic Data

According to Moody's Analytics, dated November 2021, the Washington MMSA economy is recovering slowly from the recession. The shortfall in nonfarm payrolls relative to pre-pandemic levels is still significant when compared to the national average. Housing prices are high, despite housing permits increasing. Professional and business services, government, education and health services, and leisure and hospitality services remain important economic drivers. The largest employers are the Federal Government, MedStar Health, Marriot International Inc., and Inova Health System.

According to the U.S. BLS, the unemployment rate in January 2019 was 3.8 percent while the unemployment rate in December 2021 was 3.9 percent. Pandemic-related unemployment peaked at 9.6 percent in April 2020.

Community Contacts

The OCC reviewed three community contacts completed during the evaluation period with organizations located throughout the Washington MMSA. The community contacts are organizations focused on areas such as affordable housing, small businesses, economic development, and advocacy for LMI individuals and communities. The most prevalent need identified by most contacts was affordable housing for LMI individuals and families. The contacts indicate that there are significant CD needs across the MMSA including access to credit, financial education, and products and services that promote and attract first time home buyers with moderate- or low- incomes.

One participant commented that the largest employment losses have been in small business, however some businesses have been able to shift focus to absorb some of these losses. The city (DC) has largely become a mix of extremely poor and extremely rich residents and the housing squeeze is felt in the middle- and moderate-incomes. The DC area is a high-cost area, and many low-income residents receive government housing assistance. Those making \$50,000 to \$80,000 often cannot find affordable housing and commute from outer areas. The city has been exploring implementing workforce housing developments to help working moderate- and middle-income individuals and families find affordable housing.

Contacts noted that there are numerous opportunities for banks to help address credit and community development needs by supporting affordable housing for low-income households, flexible loan programs for first time homebuyers, financial coaching, and counseling.

Other identified needs include:

- Affordable housing including funding for individuals to purchase housing or partnering with nonprofits who provide this type of housing for LMI individuals
- Resources and education for small businesses
- Convenient and local access to financial education training and ongoing mentoring
- Economic development and neighborhood revitalization to benefit LMI individuals
- Financial literacy programs
- Credit alternative products for customers who have low or no credit scores.

Scope of Evaluation in the Washington MMSA

The Washington MMSA received a full-scope review.

Within the Lending Test, home mortgage lending received more weight than small business lending due to a larger volume of mortgage loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Washington MMSA	238	146	6	390

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Washington MMSA	218,283	38,594	50,760	307,637

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 0.2 percent. The bank ranked 27th among 49 depository financial institutions placing it in the top 58 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 128th among 681 home mortgage lenders in the AA, which placed it in the top 19 percent of lenders. The top three lenders with a combined market share of 15.1 percent were Rocket Mortgage (5.7 percent), Truist Bank (4.9 percent), and Wells Fargo Bank, National Association (4.6 percent).

According to peer small business data for 2021, the bank had a market share of 0.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 56th among 247 small business lenders in the AA, which placed it in the top 23 percent of lenders. The top three lenders with a combined market share of 46.9 percent were American Express National Bank (23.1 percent), Bank of America, National Association (13.5 percent), and JPMorgan Chase Bank, National Association (10.4 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

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

Small Loans to Businesses

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

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

The bank's percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Washington 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.

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

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but was near to the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and was well below the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the Washington 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.

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

The bank did not collect or consider the gross annual revenues in the underwriting of 13.7 percent of its small loans to businesses, all of which were PPP loans. The bank's percentage of small loans to businesses with revenues of \$1 million or less was well below both the percentage of businesses with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a neutral effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

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

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

The bank made six CD loans totaling \$50.8 million, which represented 189.2 percent of the allocated tier 1 capital. CD loans primarily supported community services. By dollar volume, 96.3 percent funded community services targeted to LMI individuals and 3.7 percent of these loans funded affordable housing.

Examples of CD loans include:

- The bank made two loans totaling \$48.8 million to a charter school to refinance bonds that were used in part to acquire a school serving LMI students. The school’s students all qualify for a free or reduced school lunch and the school is located in a moderate-income census tract.
- The bank made a \$1.8 million loan as part of a participation in an affordable housing project. The bank’s proceeds will assist in the construction of 26 units of housing affordable to moderate-income individuals and households. The project is located in a moderate-income census tract.

Product Innovation and Flexibility

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. Within the Washington MMSA, CNB made 91 PPP loans totaling \$19.4 million, of which 26 loans totaling \$5.5 million were located in either a low- or moderate-income census tract.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Washington MMSA is rated Outstanding.

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

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Washington MMSA	1	821	35	2,657	36	100.0	3,478	100.0	2	2,183

* 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 bank made 35 investments totaling \$2.7 million during the evaluation period, which includes 33 qualifying grants and donations totaling \$142,000 to 14 organizations and has two unfunded and binding commitments totaling \$2.2 million. The dollar volume of current- and prior-period investments represented 13 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 76.5 percent of investments and donations supported affordable housing, 2.5 percent

supported community services targeted to LMI individuals, and 21 percent supported economic development. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB invested \$2 million in a LIHTC fund used to construct approximately two units of affordable housing available to LMI families within the AA. CNB’s investment was part of a larger fund that created additional affordable housing units.
- CNB made multiple donations totaling \$15,000 to an affordable housing organization that constructs new single-family units at low affordable mortgage payments to LMI families within the AA.
- CNB invested \$515,000 in an SBIC used to support approximately 13 small businesses within the AA.

SERVICE TEST

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

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

Retail Banking Services

Distribution of Branch Delivery System														
Assessment Area	Deposits		Branches						Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA	
Washington MMSA	100	2	100	0	50	50	0	0	0	13.2	11.9	30.9	42.6	1.5

* Totals may not equal 100.0 percent due to rounding.

** The NA category consists of geographies that have not been assigned an income classification.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA. CNB’s distribution of branches in low-income geographies was significantly below and in moderate-income geographies exceeded, the percentage of the population living within those geographies.

CNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. CNB had two ATMs in the AA, both of which were deposit-taking.

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

** The NA category consists of geographies that have not been assigned an income classification.

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies or to low- and moderate -income individuals. CNB opened one branch in a middle-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. CNB maintained standard business hours Monday through Friday from 8:30 a.m. to 5:00 p.m. at the branch located in Washington, D.C. and 9:00 a.m. to 5:00 p.m. at the branch located in Virginia. CNB offered traditional banking products and services at both branch locations in the AA.

Community Development Services

The institution provides a relatively high level of CD services.

CNB employees provided 138 qualified CD service activities to approximately 10 organizations with 269 qualified hours within this AA during the evaluation period. Leadership was evident through Board or committee participation in 98 of these activities with four employees providing 228 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with economic development.

Service activity examples during the evaluation period include:

- An employee served on the board of an organization that provides economic development services to African American and minority owned small businesses.
- An employee provided technical assistance to an organization that serves asylum seekers by providing social work and employment programs. The bank employee provided pre-employment coaching and arranged job interview opportunities within their network.
- An employee served on the board of an organization that provides opportunities for a strong academic foundation for LMI pre-kindergarten (PreK) to 12th grade students and their families to promote higher education and professional leadership.

State Ratings

State of California

CRA rating for the state of California: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- The Lending Test rating was lowered to Needs to Improve from Low Satisfactory as a result of the extent and nature of evidence of discriminatory and illegal credit practices, as described in the Discriminatory or Other Illegal Credit Practices section of this document.
- Adequate lending performance based on poor geographic and borrower distributions of loans, excellent responsiveness when considering lending activity, and leadership in making CD loans, which had a positive impact on the Lending Test rating.
- Excellent investment performance based on an excellent level of investments and donations, including complex investments, and responsiveness to identified needs for affordable housing and economic development.
- Poor service performance based on an unreasonably inaccessible service delivery network despite leadership in providing CD services.

Description of Institution's Operations in California

CNB delineated multiple AAs in California. They include the MSAs that comprise the Los Angeles-Long Beach, CA CSA (Los Angeles CSA), portions of the MSAs that comprise the San Jose-San Francisco-Oakland, CA CSA (San Francisco CSA), the entire San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA), and a portion of the Santa Maria-Santa Barbara, CA MSA, which comprises the entirety of the City of Santa Barbara (Santa Barbara MSA). The AAs that comprise the Los Angeles CSA and San Francisco CSA were combined for analysis and presentation purposes. Refer to Appendix A for a list of the counties reviewed.

CNB had \$56.7 billion in deposits in the state of California representing 86.2 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 54 branches and 55 ATMs, of which 53 were deposit-taking, within the rating area, representing 73 percent of total bank branches and 74.7 percent of total ATMs. The bank originated and purchased approximately \$16.5 billion in home mortgage and small business loans within the state of California representing 82.1 percent of total bank loan originations and purchases. The state of California represented the largest retail market for the bank in terms of lending, deposits, branches, and ATMs. According to FDIC deposit-market share data, as of June 30, 2021, there were 158 FDIC-insured institutions operating 4,535 branches in the bank's AAs within California. CNB ranked eighth in deposit share, with 3.1 percent. The top three banks by deposit market share were Bank of America, National Association, with 21.3 percent, Wells Fargo Bank, National Association with 14.3 percent, and JPMorgan Chase Bank, National Association 13.1 percent.

Los Angeles CSA

CNB delineated three AAs within the Los Angeles CSA that were combined for analysis and presentation purposes. These included the entire Los Angeles-Long Beach-Anaheim, CA, Oxnard-Thousand Oaks-Ventura, CA, and Riverside-San Bernardino-Ontario, CA MSAs.

CNB had \$50.8 billion in deposits in the Los Angeles CSA, representing 77.3 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated 41 branches and 44 ATMs, of which 42 were deposit taking, representing 55.4 percent of total branches and 58.7 percent of total ATMs. The bank originated and purchased approximately \$13.9 billion in home mortgage and small business loans within the Los Angeles CSA representing 69.1 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 127 FDIC-insured institutions operating 2,867 branches in the AA. CNB ranked fifth in deposit share, with 5.8 percent. The top three banks by deposit market share were Bank of America, National Association with 17.4 percent, JPMorgan Chase Bank, National Association with 15.8 percent, and Wells Fargo Bank, National Association with 14.7 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Los Angeles CSA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,925	8.1	28.5	28.6	33.2	1.6
Population by Geography	18,388,091	7.6	28.6	29.4	33.8	0.5
Housing Units by Geography	6,346,543	6.7	26.2	29.2	37.5	0.4
Owner-Occupied Units by Geography	3,074,292	2.6	18.6	30.8	47.9	0.1
Occupied Rental Units by Geography	2,780,656	11.3	34.6	27.1	26.4	0.6
Vacant Units by Geography	491,595	6.4	26.1	31.5	35.3	0.7
Businesses by Geography	1,937,113	4.8	20.2	26.9	46.6	1.5
Farms by Geography	23,826	3.8	20.4	31.1	44.0	0.6
Family Distribution by Income Level	4,090,774	23.9	16.5	17.6	42.0	0.0
Household Distribution by Income Level	5,854,948	25.3	15.6	16.5	42.6	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$86,003	Median Housing Value				\$449,452
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$62,703	Median Gross Rent				\$1,330
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA	\$86,766	Families Below Poverty Level				13.1%
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA	\$61,507					
<i>Source: 2015 ACS and 2021 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>						

The OCC evaluated the disparity between the median incomes of families within the CSA and the cost of housing. Median family incomes ranged from a low of \$61,507 in the Riverside-San Bernardino-Ontario, CA MSA to a high of \$86,766 in the Oxnard-Thousand Oaks-Ventura, CA MSA. Through the Los Angeles CSA, low-income families earned \$30,754 to \$43,383 while moderate-income families earned \$49,206 to \$69,413. The median housing value in the AA was \$449,452, while the NAR median sales price of a single-family home was \$611,200 in calendar year 2019 and increased to \$801,300 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than

30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$769 and \$1,085 for low-income borrowers and between \$1,230 and \$1,735 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$2,412. LMI borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Los Angeles CSA, the overall family poverty level was 13.1 percent.

Economic Data

Los Angeles-Long Beach-Anaheim, CA MSA

According to Moody's Analytics, dated November 2021, the Los Angeles economy trails the broader U.S. recovery. However, short-term data suggests job growth is stronger than monthly estimates suggest. Healthcare and transportation have seen the largest employment gains while the high price appreciation in homes has leveled off. Employment in the entertainment industry trails the broader economy, with less than half of the pandemic-related job losses being regained. However, job growth exceeds the rest of the economy as shooting days are increasing and feature-film production approaches the fastest recovery since before the COVID-19 pandemic began. Filming, while remaining a core component of the local economy, continues to lose ground to less expensive locales, such as Georgia and Louisiana.

Logistics remains vital to the economy and the Ports of Los Angeles and Long Beach remain congested with goods shipments from East Asian manufacturing economies. More than one-third of U.S. imports pass through these two ports, ensuring strong baseline employment levels. Office employment has declined in the area as more companies move towards flexible or permanent remote work arrangements. Office vacancies have increased but a lack of local office workers threatens supporting industries, such as local hospitality, which have only regained approximately 80 percent of the jobs lost during the pandemic.

Healthcare, logistics, entertainment, tourism, fashion, and tech continue to provide varied employment options in Los Angeles. The largest employers in the region include Cedars-Sinai Medical Center, the Los Angeles International Airport (LAX), the University of California – Los Angeles (UCLA), and the Walt Disney Company

Like Los Angeles, the economic recovery in Anaheim continues to trail the nation but is strong compared to the rest of California. The region has replaced approximately 70 percent of jobs lost during the COVID-19 pandemic. Technology, tourism, and leisure lead job growth. Healthcare has stabilized while finance-related employment continues to decline. Tourist destinations, including Disneyland and Universal Studios - Hollywood continue to fuel the recovery due to demand for consumer travel and leisure activities. The area has primarily attracted domestic travelers as visits from international travelers remain depressed due to stronger COVID-19 protocols aboard.

Anaheim has one of the highest concentrations of office-using employment in the nation and the continued move towards hybrid and permanent remote work threatens support industries, such as hospitality and other consumer services. Low rents in the area, compared to the rest of the regional area, may attract office-based employers to the area.

Housing affordability continues to deteriorate in the region, as housing prices have accelerated significantly due to longstanding shortages and increased demand, driven by historically low mortgage interest rates and an

increased ability for employees to work remotely. The lack of affordability threatens to displace LMI workers, reducing the workforce for service jobs. Housing inventory and housing starts remain low due to capacity and zoning restrictions, further exacerbating affordability concerns. Hospitality, education, and health care remain the major industries in Anaheim. The largest employers in the region include Walt Disney Resorts, the University of California – Irvine, St. Joseph’s Health, and Kaiser Permanente.

According to the U.S. BLS, the unemployment rate in January 2019 was 4.6 percent while the unemployment rate in December 2021 was 5.1 percent. Pandemic-related unemployment peaked at 18.3 percent in May 2020.

Oxnard-Thousand Oaks-Ventura, CA MSA

The recovery in Oxnard continues to trail the nation, with the region recovering only 60 percent of jobs lost during the COVID-19 pandemic. Healthcare, tourism, and leisure have led the recovery. Hourly earnings have increased over the past year, but home prices continue to accelerate at a higher rate than the rest of the country. Residential housing starts have increased but are only slightly stronger than before the pandemic. The population shrank for the third consecutive year in 2020. The reversal of immigration restrictions should improve demographics and allow for increased farm employment, despite the lack of housing affordability in the region.

The technology sector should regain most of its lost jobs by 2022, but the area’s focus on computer systems and pharmaceutical manufacturing may result in a slower recovery compared to tech hubs such as San Francisco and the rest of Silicon Valley. The potential decline in high-wage jobs will affect local consumer services and housing. That said, the presence of Ventura Naval Base and Channel Island Air National Guard station provide stability as defense spending remains elevated and servicemembers buoy local consumer services industries. Major industries include defense, tech, agriculture, and healthcare. The largest employers in the region include Ventura Naval Base, Amgen Inc., Bank of America, National Association, and WellPoint Health Networks Inc.

According to the U.S. BLS, the unemployment rate in January 2019 was 4.5 percent while the unemployment rate in December 2021 was 4.2 percent. Pandemic-related unemployment peaked at 14.3 percent in April 2020.

Riverside-San Bernardino-Ontario, CA MSA

The recovery in Riverside leads the state and country, fueled by job growth in transportation, hospitality, and healthcare. Access to the ports at Los Angeles and Long Beach coupled with proximity to major cities and highways make the area a major logistics hub. Defense is also a major industry, with the region housing the U.S. Marine Corps Combat Center, Fort Irwin, and the March Air Reserve Base.

Unlike the rest of California, Riverside has seen population growth due to lower living and business costs relative to the rest of the state. Population growth will support consumer industries that are threatened in other parts of California, particularly along the expensive coasts. Housing is expected to continue to increase, with current levels of appreciation outpacing the broader U.S. and state. Major industries include transportation, hospitality, healthcare, and defense. The largest employers in the region include Stater Brothers Markets, Arrowhead Regional Medical Center, U.S. Marine Corps Air Ground Combat Center, and Fort Irwin.

According to the U.S. BLS, the unemployment rate in January 2019 was 4.7 percent while the unemployment rate in December 2021 was 5 percent. Pandemic-related unemployment peaked at 15.6 percent in May 2020.

Community Contacts

The OCC reviewed twelve community contacts completed during the evaluation period with organizations located throughout the Los Angeles CSA. The community contacts are organizations focused on areas such as

affordable housing, small business development, economic development, and financial education. The most prevalent need identified by most contacts was affordable housing. Contacts noted the high cost of housing throughout much of the area and the need to develop more affordable rental and homeownership options was a concern. The supply of housing severely lags demand. Additionally, high housing costs and lack of inventory discourage or prevent many LMI households from homeownership opportunities. Many locations in the CSA have significant numbers of unskilled workers in minimum wage jobs with insufficient earnings to cover the cost of housing. According to the contacts, workers in the area struggle with access to affordable housing, endure longer commutes, and face rising costs for everyday needs such as food, clothing, and childcare. Also, many communities have a growing elderly population in need of affordable and accessible housing.

In addition to affordable housing, there is a need for financial education and small business development. Many individuals and small businesses have significant credit needs but do not have the history or financial management skills to obtain credit from a financial institution. The contacts noted that financial institutions can provide financial education in LMI communities or become sponsor partners for non-profits. Contacts noted challenges that many small businesses face in qualifying for traditional financing and access to credit.

Many contacts noted that demand for micro loans to business is strong, but these loans are not generally available from banks. In addition, contacts identified needs for small dollar consumer loans, and flexible lending standards for small businesses.

Other identified needs include:

- Financial literacy and empowerment programs for LMI populations and small businesses
- Affordable housing for LMI households, working families and seniors
- Economic development to stimulate small business growth for job creation
- Credit alternative products for customers who have low or no credit scores
- Small business capital, including start-up funding
- Bilingual financial services assistance
- Affordable or Free childcare
- Free Transportation for LMI individuals starting jobs
- Support for community organizations.

Scope of Evaluation in California

The Los Angeles CSA received a full-scope review. This AA accounted for 89.6 percent of deposits, 76 percent of branches, and 85.9 percent of lending in the state of California during the evaluation period. The three remaining AAs received limited-scope reviews.

Within the Lending Test for the Los Angeles CSA, San Diego MSA, and San Francisco CSA, small business lending received more weight than home mortgage lending due to a larger volume of small business loans within the AA. Within the Santa Barbara MSA, home mortgage lending received more weight than small business lending due to a larger volume of home mortgage loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

The bank's performance under the Lending Test in California is rated Needs to Improve. The Lending Test rating was lowered to Needs to Improve from Low Satisfactory as a result of the extent and nature of evidence of discriminatory and illegal credit practices, as described in the Discriminatory or Other Illegal Credit Practices section of this document. Performance in the limited-scope areas had a neutral impact on the overall Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles CSA was adequate.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Los Angeles CSA	8,515	20,068	280	28,863	85.9	89.6
San Diego MSA	723	1,095	30	1,848	5.5	2.2
San Francisco CSA	1,129	1,538	55	2,722	8.1	8.2
Santa Barbara MSA	110	37	0	147	0.4	0.0
BSRA	-	-	20	20	0.1	-
Total	10,477	22,738	385	33,600	100.0	100.0

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

Dollar Volume of Loans (\$000s) *						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Los Angeles CSA	10,717,414	3,144,742	1,308,521	15,170,677	83.3	89.6
San Diego MSA	702,715	257,479	125,013	1,085,207	6.0	2.2
San Francisco CSA	961,921	397,886	186,785	1,546,592	8.5	8.2
Santa Barbara MSA	286,085	8,919	0	295,004	1.6	0.0
BSRA	-	-	109,900	109,900	0.6	-
Total	12,668,135	3,809,026	1,730,219	18,207,380	100.0	100.0

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

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 5.8 percent. The bank ranked fifth among 127 depository financial institutions placing it in the top 4 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.3 percent based on the number of home mortgage loans originated or purchased. The bank ranked 52nd among 1,015 home mortgage lenders in the AA, which placed it in the top 6 percent of lenders. The top three lenders with a combined market share of 22.3 percent were United Wholesale Mortgage (9.3 percent), Rocket Mortgage (9 percent), and Loandepot.com, LLC (3.9 percent).

According to peer small business data for 2021, the bank had a market share of 0.9 percent based on the number of small loans to businesses originated or purchased. The bank ranked 13th among 379 small business lenders in the AA, which placed it in the top 4 percent of lenders. The top three lenders with a combined market share of 49.3 percent were American Express National Bank (20.2 percent), JPMorgan Chase Bank, National Association (15.2 percent), and Bank of America, National Association (13.9 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in those geographies and was well below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

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

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

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

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but was below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the California 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.

When determining the conclusion in this AA, we considered the fact that 45.4 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of 47.5 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with gross annual revenues of \$1 million or less but was well below the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

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

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

The bank made 280 CD loans totaling \$1.3 billion, which represented 24.8 percent of the allocated tier 1 capital. CD loans primarily supported economic development and community service. By dollar volume, 42.2 percent funded economic development, 36.6 percent funded community services targeted to LMI individuals, 15.7 percent funded affordable housing, and 5.4 percent funded revitalization and stabilization efforts.

Examples of CD loans include:

- The bank made a \$32 million loan to an aluminum and titanium forging supplier providing products for commercial aerospace, military aerospace, space programs, electronics industries, and semiconductor industries. The company qualifies as a small business under SBA size standards. The business is located in a moderate-income geography in Los Angeles County.
- The bank made a \$14.5 million loan to a non-profit that provides housing and other support services to families who have traveled from their homes to be near and support their child who is battling cancer or other serious illnesses requiring long hospitalizations. The organization provides over 70 percent of its services free of charge to LMI families. The organization is headquartered in Los Angeles County.
- The bank made a \$100 million loan to support affordable housing. The loan is made in conjunction with capital grants from HUD and the state of California. The loan will support the acquisition, renovation, and development of five newly constructed multi-family properties. The project will develop 650-units of low-income housing within the city of Los Angeles.
- The bank made a \$20 million loan to a developer, manufacturer, and wholesaler of audio and consumer electronic accessories. The business qualifies as small business under SBA size standards. The businesses operations are located in a low-income geography in Ventura County.

- The bank made a \$1.8 million loan to support 40 attorneys working for a non-profit providing legal services to indigent individuals in Orange County.

Because the bank was responsive to community development needs and opportunities in the full-scope AA, broader statewide and regional CD lending that does not have a purpose, mandate, or function to serve the AA received consideration in this assessment. During the evaluation period, CNB made 20 loans totaling \$109.9 million in the broader statewide region, which represented 1.9 percent of allocated tier 1 capital for the state of California. These loans had a neutral impact on the overall Lending Test conclusion.

Product Innovation and Flexibility

The institution makes extensive use of flexible lending practices in order to serve AA credit needs. Throughout the evaluation period, the bank made 279 SBA loans totaling \$423.8 million in the Los Angeles CSA. The bank made 44 SBA loans totaling \$61.9 million in limited-scope AAs. Within all California AAs, CNB made 17,522 PPP loans totaling \$2.3 billion. Of those PPP loans, 2,465 loans totaling \$479.2 million were in either a low- or moderate-income census tract. Additionally, the bank made eight SBA loans totaling \$8 million throughout the state of California in geographies that were not part of the BSRA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the San Diego MSA and Santa Barbara MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in the San Francisco CSA is stronger than the bank's overall performance in the Lending Test under the full-scope area. Stronger performance is due to better geographic distribution and borrower distribution of loans. Performance in the limited-scope AAs had a neutral impact on the Lending Test rating.

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

INVESTMENT TEST

The institution's performance under the Investment Test in the California is rated Outstanding. Performance in the limited-scope areas had a neutral impact on the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

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

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles CSA	140	157,042	1,176	247,970	1316	74.7	405,012	84.1	85	81,377
San Diego MSA	23	14,473	122	1,457	145	8.2	15,930	3.3	11	4,088
San Francisco CSA	63	44,241	207	13,647	270	15.3	57,888	12.0	37	6,410
Santa Barbara MSA	2	1,730	28	1,126	30	1.7	2,856	0.6	2	301
Total	228	217,486	1,533	264,200	1,761	100.0	481,686	100.0	135	92,176

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

** 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 bank made 1,176 investments totaling \$248 million during the evaluation period, which includes 1,140 qualifying grants and donations totaling \$13.2 million to approximately 359 organizations. The dollar volume of current- and prior-period investments represented 7.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 85.1 percent of investments and donations supported affordable housing, 12.7 percent supported economic development, and 2.2 percent supported community services targeted to LMI individuals. The bank made extensive use of innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB invested \$9.6 million in a LIHTC fund used to construct approximately 10 units of housing available to LMI families within the AA. CNB's investment was part of a larger fund that created additional affordable housing units.
- CNB made multiple donations, totaling \$1.2 million to a community service organization that supports financial education in both English and Spanish at schools that predominantly serve LMI students within the AA.
- CNB invested \$2 million in a SBIC fund used to provide financing for small businesses within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the San Francisco CSA, San Diego MSA, and Santa Barbara MSA is consistent with the bank's performance in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in the California is rated Needs to Improve. Performance in the limited-scope areas had a neutral impact on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles CSA was poor.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Los Angeles CSA	89.6	41	75.9	0	4.9	22	65.9	7.32	7.6	28.6	29.4	33.8	0.5
San Diego MSA	2.2	5	9.3	0	0	0	100	0	8.9	23.6	32.5	34.7	0.3
San Francisco CSA	8.2	8	14.8	25	12.5	12.5	50	0	10.9	21.7	33.6	33.5	0.4
Santa Barbara MSA	0	0***	0	0	0	0	0	0	6.6	20.9	19.1	53.4	0

Totals may not equal 100.0 percent due to rounding

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

** The NA category consists of geographies that have not been assigned an income classification

***No branches were operated in the Santa Barbara MSA. CNB operated a single deposit-taking ATM in the AA

Delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals. CNB's distribution of branches in low-income geographies and moderate-income geographies was significantly below the percentage of the population living within those geographies.

CNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. CNB had 44 ATMs in the AA, of which 42 were deposit-taking.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA**
Los Angeles CSA	5	8	0	0	1	1	1
San Diego MSA	0	0	0	0	0	0	0
San Francisco CSA	0	1	0	1	0	0	0
Santa Barbara MSA	0	0	0	0	0	0	0

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

** The NA category consists of geographies that have not been assigned an income classification

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. The bank opened five and closed eight branches in geographies with income information unavailable and in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AA, particularly LMI geographies or individuals. CNB maintained standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday and offered traditional banking products for all branch locations in the AA. Of the 41 branches in the AA, nine have drive-thru facilities, including one of the two branches located in moderate-income geographies. CNB maintained the same banking hours for lobby and drive-thru facilities. Three branches operate walk-up windows from 9:00 a.m. to 5:00 p.m. Monday through Friday.

Community Development Services

The institution is a leader in providing CD services.

CNB employees provided 4,822 qualified CD service activities to approximately 169 organizations with 11,203 qualified hours within this AA during the evaluation period, directly benefiting at least 9,088 LMI individuals.

Leadership is evident through Board or committee participation in 2,989 of these activities with 101 bank employees providing 5,986 board service hours. The bank's assistance was responsive to identified needs in the AA, particularly with community services to LMI households and individuals and affordable housing.

Service activity examples during the evaluation period include:

- Seven bank employees supported applications for grants from the Federal Home Loan Bank (FHLB) Affordable Housing Program (AHP) and Access to Housing and Economic Assistance for Development (AHEAD) programs to support affordable housing projects and economic development initiatives. These employees dedicated 708 hours to the submission of 29 AHP grant applications, of which six were successful, resulting in the FHLB awarding \$5.4 million in grant funds to those affordable housing projects. One of those employees dedicated an additional 99 hours to 22 AHEAD grant applications, of which four grants were successfully awarded to support affordable housing and economic development projects, totaling \$125,000.
- Two members of senior management participated in the OCC's Project REACH in Los Angeles. REACH stands for Roundtable for Economic Access and Change. The project brings together leaders from the banking industry, national civil rights organizations, business, and technology to reduce specific barriers that prevent full, equal, and fair participation in the nation's economy. LA REACH focused on solutions for increasing homeownership and supporting small businesses in low-income, moderate-income, and minority communities and revitalizing Minority Depository Institutions (MDI) in the greater Los Angeles area. These senior leaders dedicated 164 hours of service to these projects during the evaluation period.
- Multiple bank employees served as mentors for LMI middle school students throughout Los Angeles. This mentorship program included professional development, financial education, and skill building. Throughout the evaluation period, employees provided 909 hours of service to this program.
- As a response to the COVID-19 pandemic, CNB developed a virtual money management class targeted to LMI schools and non-profits. These classes were taught via web conferencing software and included various financial topics including budgeting, mobile banking, identity theft, and other financial topics. Multiple bank employees volunteered their time totaling 129 hours during the evaluation period.
- In Ventura County, a bank employee served on the board of directors for a local organization that supports economic growth and job creation. The organization seeks to empower business owners, connect community partners, and support the regional economy via business consulting, funding, and strategic initiatives. Throughout the evaluation period, the employee provided 109 volunteer hours in this role.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the San Francisco CSA was stronger than the bank's performance under the Service Test in the full-scope area. Stronger performance in the San Francisco CSA was due to more accessible service delivery systems. The bank's performance under the Service Test in the Santa Barbara and San Diego MSAs was consistent with the bank's overall performance in the full-scope area. Performance in the limited-scope AAs had a neutral impact on the Lending Test rating.

State of Florida

CRA rating for the state of Florida: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Poor lending performance based on poor geographic and borrower distributions of loans and a low level of CD lending, which had a neutral impact on the Lending Test rating, despite excellent responsiveness when considering lending activity.
- Excellent investment performance based on an excellent level of investments and donations and responsiveness to identified needs for affordable housing.
- Poor service performance based on inaccessible service delivery systems and a limited level of CD services.

Description of Institution's Operations in Florida

The state of Florida is a new rating area for CNB for this evaluation. CNB opened a single branch in Miami, Florida in October 2019. City National Bank operates as CN Bank within the state of Florida due to the presence of another City National Bank operating within the state.

CNB delineated one AA within the state of Florida. It consists of a portion of the Miami-Fort Lauderdale-Pompano Beach, FL MSA (Miami MSA). Refer to Appendix A for a list of the counties reviewed.

Miami MSA

CNB had \$75 million in deposits in the Miami MSA representing 0.1 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated one branch and no ATMs within the AA, representing 1.4 percent of total bank branches. The bank originated and purchased approximately \$186.7 million in home mortgage and small business loans within the AA representing 0.9 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 55 FDIC-insured institutions operating 614 branches in the AA. CNB ranked 47th in deposit market share with less than 0.1 percent. The top three banks by deposit market share are Bank of America, National Association with 15.2 percent, Wells Fargo Bank, National Association with 11.6 percent, and JPMorgan Chase Bank, National Association with 10.3 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Miami MSA.

Table A – Demographic Information of the Assessment Area**Assessment Area: Miami MSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	519	5.8	27.7	28.9	34.1	3.5
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	791,580	3.1	20.8	26.3	47.5	2.3
Farms by Geography	7,895	3.9	23.7	27.1	44.5	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.6	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

* The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Miami MSA was \$49,264. Based on this information low-income families earned less than \$24,632 and moderate-income families earned less than \$39,411. The median housing value in the AA is \$244,010 while the NAR median sales price of a single-family home was \$360,000 in calendar year 2019 and increased to \$480,000 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$616 for a low-income borrower and \$985 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,310. LMI borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Miami MSA, the overall family poverty level was 16.9 percent.

Economic Data

According to Moody's Analytics, dated November 2021, the Miami economy is steadily recovering from the pandemic; however, that recovery has been restrained by the pandemic's impact on the travel industry. Despite this weakness in travel, payroll employment is nearing its pre-pandemic level. Notable weaknesses include congested roads and airport, and an economy that is particularly susceptible to business cycle downturns.

Housing prices are rising rapidly. Housing permits are increasing. Education and health services, professional and business services, government, and retail trade are important economic drivers. The largest employers are

Publix Super Markets, Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University.

According to the U.S. BLS, the unemployment rate in January 2019 was 3.6 percent while the unemployment rate in December 2021 was 2.9 percent. Pandemic-related unemployment peaked at 14.5 percent in July 2020.

Community Contacts

A review of four community contacts completed during the evaluation period with organizations located throughout the Miami MSA was conducted. The community contacts are organizations focused on areas such as affordable housing, small business development, and community services.

The most prevalent need identified by most contacts were affordable housing and small business lending. According to one community contact, there are various neighborhoods in South Florida in danger of displacement. Residents in neighborhoods like Overtown, Little Haiti, Coconut Grove, Little Havana, and Sistrunk are being priced out by developers and are in danger of displacement. The widening gap between wealthy business owners and LMI individuals is a pressing concern as business owners continue to benefit from strong profits while lower income individuals are negatively impacted by low wages and a lack of affordable housing.

Overall, the housing market and economy are very strong. Several large corporations are relocating to Miami, resulting in a significant demand for housing. As a result, rent prices and home prices are near all-time highs, which place LMI individuals in a position where they are unable to afford to live in Miami.

Community contacts in the AA stated that there is immediate demand for affordable housing, as new housing stock caters to upper-income borrowers. One community contact identified that around 40 percent of homeowners and 53 percent of renters are classified as cost-burdened because they pay more than 30 percent of their household income on housing. The contact added that non-profit developers have undertaken several projects which would help somewhat to alleviate the affordable housing concern. While lenders in the area have worked to meet real estate needs, elevated down payment requirements have drastically limited housing affordability for LMI households.

Many contacts noted that small businesses have encounter limited access to credit in recent years due to tightened lending standards. Many contacts noted that demand for micro loans to businesses is strong, but these loans are not generally available from banks. In addition, contacts identified needs for small dollar consumer loans and flexible lending standards for small businesses.

Other identified needs include:

- Affordable rental housing, especially in areas experiencing population growth
- Financial education for individuals and small business
- Small business assistance
- Small dollar loan, working capital and lines of credit
- Financial education, mentoring, and coaching support for small businesses
- Support for community organizations
- Microfinancing for smaller businesses

Scope of Evaluation in Florida

The Miami MSA received a full-scope review. There were no other AAs within the state of Florida. Within the Lending Test in the Miami MSA, mortgage lending received more weight than small business lending due to a larger volume of mortgage loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Miami MSA was poor.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Miami MSA	89	61	1	151

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Miami MSA	180,402	6,311	250	186,963

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of less than 0.1 percent. The bank ranked 47th among 55 depository financial institutions placing it in the top 85 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.6 percent based on the number of home mortgage loans originated or purchased. The bank ranked 34th among 803 home mortgage lenders in the AA, which placed it in the top 5 percent of lenders. The top three lenders with a combined market share of 19.5 percent were United Wholesale Mortgage (8 percent), Rocket Mortgage (6.7 percent), and Caliber Home Loans, Inc. (4.9 percent).

According to peer small business data for 2021, the bank had a market share of less than 0.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 83rd among 237 small business lenders in the AA, which placed it in the top 36 percent of lenders. The top three lenders with a combined market share of 49.1 percent were American Express National Bank (22.4 percent), Bank of America, National Association (14.6 percent), and JPMorgan Chase Bank, National Association (12.2 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied homes in those geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied homes in those geographies and was below the aggregate distribution of loans.

Small Loans to Businesses

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

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

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

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners identified conspicuous gaps in LMI geographies for both home mortgage and small business lending that are explained by the bank's limited volume of home mortgage loans and small loans to businesses in relation to the number of census tracts in the AA, the bank's limited operations in the AA, and the bank's poor overall geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a poor borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

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

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

Small Loans to Businesses

Refer to Table R in the Florida 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.

When determining the conclusion in this AA, we considered the fact that 44.3 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and

considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 45.9 percent of its small loans to businesses. The bank’s percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with gross annual revenues of \$1 million or less but was well below the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower

Community Development Lending

The institution has made a low level of CD loans. CD lending had a neutral effect on the Lending Test conclusion.

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

The bank originated one CD loan totaling \$250,000 which represented 3.2 percent of the allocated tier 1 capital. The CD loan supported affordable community services targeted to LMI individuals by providing healthcare to the uninsured and underinsured. The borrower operates 11 primary care centers, of which the majority are located in LMI geographies.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank made 43 PPP loans totaling \$4.1 million in the Miami MSA. Of those PPP loans, five loans totaling \$139,901 were located in either a low- or moderate-income geography.

INVESTMENT TEST

The institution’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 MSA is excellent.

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Miami MSA	0	0	7	1,043	7	100	1,043	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 bank made seven investments totaling \$1 million during the evaluation period, which include six qualifying grants and donations totaling \$33,000 to three organizations. The dollar volume of current- and prior-period investments represented 13.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98 percent of investments and donations supported affordable housing, 1.5 percent supported community services to LMI individuals, and 0.5 percent supported economic development. The institution occasionally used innovative and/or complex investments to support CD initiatives.

Examples of CD Investments and Donations include:

- CNB invested \$1 million in a LIHTC fund used to construct approximately one unit of housing available to LMI families within the AA. CNB’s investment was part of a larger fund that created additional affordable housing units.
- CNB donated \$5,000 to a community service organization used to provide customized technical assistance for small businesses within the AA.
- CNB donated \$5,000 to a CDFI that provides funding and expertise to create affordable housing units to LMI families within the AA.

SERVICE TEST

The bank’s performance under the Service Test in Florida is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Distribution of Branch Delivery System														
Assessment Area	Deposits	Branches			Location of Branches by Income of Geographies (%)					Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Low	Mod	Mid	Upp	NA**	% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA						
Miami MSA	100.0	1	100.0	0	0	0	100.0	0	5.5	29.7	30.9	33.2	0.7	

* Totals may not equal 100.0 percent due to rounding.

** The NA category consists of geographies that have not been assigned an income classification

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

The bank did not operate any branches in LMI geographies. While the bank only operated one branch in the AA, examiners considered the bank’s poor geographic distribution of lending, the branch’s limited hours, and the lack of ATMs within the AA when determining their conclusion.

CNB had several ADS including telephone banking, OLB, and mobile banking options.

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

*The NA category consists of geographies that have not been assigned an income classification

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies or to low and moderate-income individuals. CNB opened one branch in an upper-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. CNB maintained standard business hours Monday through Friday from 9:00 a.m. to 4:00 p.m. and offered traditional banking products at the single branch in the AA.

Community Development Services

The institution provided a limited level of CD services.

CNB employees provided three qualified CD service activities to one organization totaling six qualified hours within this AA during the evaluation period. The bank's assistance was responsive to identified needs in the AA, particularly with financial education for individuals. The bank employee volunteered for six hours across the evaluation period by providing virtual financial literacy, time management, and career development education that benefited 117 low-income children.

State of Georgia

CRA rating for the state of Georgia: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good lending performance based on good geographic distribution of loans, an adequate borrower distribution of loans, excellent responsiveness when considering lending activity, and an adequate level of CD lending, which had a neutral impact on the Lending Test rating.
- Excellent investment performance based on an excellent level of investments and donations and responsiveness to identified needs for economic development.
- Adequate service performance based on reasonably accessible service delivery systems and leadership in delivering CD services.

Description of Institution's Operations in Georgia

CNB delineated one AA within the state of Georgia. It consists of a portion of the Atlanta-Sandy Springs-Alphaletta, GA MSA (Atlanta MSA). Refer to Appendix A for a list of the counties reviewed.

Atlanta MSA

CNB had \$324.1 million in deposits in the Atlanta MSA representing 0.5 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated two branches and one ATM, which was deposit-taking, within the rating area, representing 2.7 percent of total bank branches and 1.3 percent of total ATMs.

The bank originated and purchased approximately \$153.5 million in home mortgage and small business loans within the Atlanta MSA representing 0.8 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 54 FDIC-insured institutions operating 387 branches in the AA. CNB ranked 23rd in deposit market share with 0.2 percent. The top three banks by deposit market share were Truist Bank with 31.7 percent, Bank of America, National Association with 24.3 percent, and Wells Fargo Bank, National Association with 17.2 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Atlanta MSA.

Table A – Demographic Information of the Assessment Area**Assessment Area: Atlanta MSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	349	20.1	24.9	14.6	38.4	2.0
Population by Geography	1,700,234	14.7	26.7	16.7	40.9	0.9
Housing Units by Geography	750,979	15.8	26.3	15.8	41.8	0.3
Owner-Occupied Units by Geography	344,356	7.0	22.3	18.4	52.2	0.1
Occupied Rental Units by Geography	302,997	22.5	29.2	13.4	34.2	0.7
Vacant Units by Geography	103,626	25.1	31.2	14.3	29.1	0.3
Businesses by Geography	397,114	10.0	22.4	15.9	50.7	1.0
Farms by Geography	4,079	10.6	23.5	18.1	47.4	0.3
Family Distribution by Income Level	363,947	25.1	15.2	15.3	44.3	0.0
Household Distribution by Income Level	647,353	26.7	16.0	16.1	41.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$225,658
			Median Gross Rent			\$1,011
			Families Below Poverty Level			13.8%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

* The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Atlanta MSA was \$67,322. Based on this information low-income families earned less than \$33,661 and moderate-income families earned less than \$53,858. The median housing value in the AA is \$225,658 while the NAR median sales price of a single-family home was \$233,200 in calendar year 2019 and increased to \$317,200 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$842 for a low-income borrower and \$1,346 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,211. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Atlanta MSA, the overall family poverty level was 13.8 percent.

Economic Data

According to Moody's Analytics, dated November 2021, the Atlanta economy is recovering vigorously from the pandemic at a rate superior to that of the nation. Payrolls are growing at an above-average rate and jobs recovery relative to the pre-pandemic peak is outperforming most of Atlanta's peers among the nation's 25 largest metro areas. The recovery is being fueled by gains in logistics and professional and business services. Housing prices are rising rapidly and are over-valued. Housing permits are increasing. Professional and business services, education and health services, government, and retail trade are important economic drivers.

The largest employers are Delta Air Lines, Emory University and Emory Healthcare, The Home Depot, Northside Hospital, and Piedmont Healthcare.

According to the U.S. BLS, the unemployment rate in January 2019 was 4.1 percent while the unemployment rate in December 2021 was 2.8 percent. Pandemic-related unemployment peaked at 12.3 percent in April 2020.

Community Contacts

The OCC reviewed two community contacts completed during the evaluation period with organizations located throughout the Atlanta MSA. The community contacts are organizations focused on areas such as economic development, consumer credit counseling, and loans for small businesses. The most prevalent need identified by the contacts was small business loans. A local city economic development corporation located in Sandy Springs noted that the economy was relatively healthy, with a low unemployment rate.

The contact raised the need for banks to participate in programs to benefit small businesses and protect local jobs. The contact also identified the need for more banks in the area to offer loans tailored to meet specific small business needs. Another economic development corporation located in DeKalb County identified similar demands for small business lending, as well as the need for banks to provide financial literacy education for LMI families/individuals.

Other identified needs include:

- Economic development services, including small business-related services
- Training on available bank services, and assistance to help business owners build skills to grow their businesses
- Education and technical assistance for small businesses
- Assistance in developing new lending program options available to businesses
- Small and large business loans
- Financial education for individuals and small businesses

Scope of Evaluation in Georgia

The Atlanta MSA received a full-scope review. There were no other AAs within the state of Georgia.

Within the Lending Test for the Atlanta MSA, small business lending received slightly more weight than home mortgage lending due to a larger volume of mortgage loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlanta MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Atlanta MSA	161	220	1	382

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Atlanta MSA	112,199	41,309	1,800	155,308

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 0.2 percent. The bank ranked 23rd among 54 depository financial institutions placing it in the top 42 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 168th among 765 home mortgage lenders in the AA, which placed it in the top 22 percent of lenders. The top three lenders with a combined market share of 15.3 percent were Rocket Mortgage (7.5 percent), Truist Bank (4.3 percent), and Ameris Bank (3.6 percent).

According to peer small business data for 2021, the bank had a market share of less than 0.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 51st among 244 small business lenders in the AA, which placed it in the top 21 percent of lenders. The top three lenders with a combined market share of 44.8 percent were American Express National Bank (25 percent), Bank of America, National Association (10.6 percent), and Wells Fargo Bank, National Association (9.2 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

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

Small Loans to Businesses

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

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

The bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The bank's percentage of

small loans to businesses in moderate-income geographies was well below both the percentage of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was well below the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but was near to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the Georgia 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.

When determining the conclusion in this AA, we considered the fact that 34.1 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 36.8 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was well below both the percentage of businesses with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower

Community Development Lending

The institution has made an adequate level of CD loans. CD lending had a positive effect on the Lending Test conclusion.

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

The bank made one CD loan totaling \$1.8 million, which represented 5.4 percent of the allocated tier 1 capital. This loan supported affordable housing and was made to a non-profit organization that develops, finances, and advocates for affordable housing in the Atlanta MSA.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. CNB made 121 PPP loans totaling \$12.1 million in the Atlanta MSA, of which 22 loans totaling \$1.9 million we originated in either a low- or moderate-income census tract. The bank made one SBA loan totaling \$1 million in the state of Georgia in a geography that was part of the BSRA.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Georgia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Atlanta MSA	4	5,812	18	632	22	100	6,444	100	4	2,550

* 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 bank made 18 current period investments totaling \$632,010 during the evaluation period, which includes 17 qualifying grants and donations totaling \$117,010 to approximately eight organizations and has unfunded and binding commitments totaling \$2.6 million. The dollar volume of current- and prior-period investments represented 19.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. By dollar volume, 82.7 percent of investments and donations supported economic development. 4.5 percent supported community services targeted to LMI individuals, and 12.8 percent supported affordable housing.

Examples of CD Investments and Donations include:

- CNB invested \$515,000 in an SBIC used to support approximately 13 small businesses by promoting growth and helping to create or retain jobs for LMI individuals within the AA.
- CNB made donations totaling \$63,500 to an affordable housing organization used to create affordable homeownership opportunities for LMI families within the AA.

- CNB donated \$7,500 to a CDFI that provides loans, business development resources, information on accessing capital, business advisory services, and individual consultations to underserved businesses within the AA.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Atlanta MSA	100.0	2	100.0	0	0	0	100.0	0	14.7	26.7	16.7	40.9	0.9

Totals may not equal 100.0 percent due to rounding.

*The NA category consists of geographies that have not been assigned an income classification.

Service delivery systems are reasonably accessible to portions of its assessment area particularly to LMI geographies and LMI individuals.

The bank did not operate any branches in LMI geographies. Examiners gave positive consideration on the accessibility of service delivery systems based on the bank’s good geographic distribution of lending in the Atlanta MSA and the presence of a deposit-taking ATM that was accessible 24 hours per day, seven days per week.

CNB had several ADS including an ATM, telephone banking, OLB, and mobile banking options. CNB had one deposit taking ATM in the AA.

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

*The NA category consists of geographies that have not been assigned an income classification.

To the extent changes have been made, the institution’s opening and closing of branches has not affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies or to low- and moderate- income individuals. CNB opened one branch in an upper-income geography during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its assessment area, particularly LMI geographies and individuals. CNB maintained branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday at one branch and 9:00 a.m. to 5:00 p.m. Monday through Friday at the second branch. Both branches offered traditional banking products.

Community Development Services

The institution is a leader in providing CD services.

CNB employees provided 142 qualified CD service activities to approximately five organizations with over 388 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 79 of these activities with two employees providing over 250 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with community services to LMI individuals and affordable housing.

Service activity examples during the evaluation period include:

- An employee volunteered as a board member for a local charity that provides holistic social services to low-income families and individuals. The employee volunteered for a total of 97 hours during the evaluation period and fund raised, managed the organizations finances, and participated in financial education programs.
- An employee served on the board of a public elementary school located in a low-income geography that primarily serves LMI students. The employee engaged in fundraising efforts totaling almost 100 hours across the evaluation period.

State of Minnesota

CRA rating for the state of Minnesota: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent lending performance based on good geographic distribution of loans, excellent borrower distribution of loans, and excellent responsiveness when considering lending activity.
- Excellent investment performance based on an excellent level of investments and donations and responsiveness to identified needs for affordable housing.
- Adequate service performance based on reasonably accessible retail delivery systems and an adequate level of CD services that were responsive to identified community needs.

Description of Institution's Operations in Minnesota

CNB delineated one AA within the state of Minnesota. It consists of a portion of the Minneapolis-St. Paul-Bloomington, MN-WI MSA (Minneapolis MSA). Refer to Appendix A for a list of the counties reviewed.

The bank's single branch in the AA closed temporarily in March 2020 and never reopened. The branch was formally closed in January 2022 and operations within the Minnesota AA ceased permanently.

Minneapolis MSA

CNB had \$24.9 million in deposits in Minnesota representing less than 0.1 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated one branch and one deposit-taking ATM within the rating area, representing 1.4 percent of total bank branches and 1.3 percent of total ATMs. The bank originated and purchased approximately \$116.6 million in home mortgage and small business loans within Minnesota representing 0.6 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 70 FDIC-insured institutions operating 266 branches in the AA. CNB ranked 62nd in deposit market share with less than 0.1 percent. The top three banks by deposit market share are Wells Fargo Bank, National Association with 41.3 percent, U.S. Bank, National Association with 25.2 percent, and Ameriprise Bank, Federal Savings Bank with 6.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Minneapolis MSA.

Table A – Demographic Information of the Assessment Area**Assessment Area: Minneapolis MSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	10.4	21.4	38.8	28.4	1.0
Population by Geography	1,197,776	9.7	19.2	37.4	33.2	0.5
Housing Units by Geography	518,332	8.9	19.2	39.1	31.9	0.8
Owner-Occupied Units by Geography	307,395	3.3	14.7	40.8	41.0	0.2
Occupied Rental Units by Geography	182,801	17.6	26.4	36.7	17.5	1.8
Vacant Units by Geography	28,136	12.9	22.2	36.3	26.9	1.7
Businesses by Geography	155,144	7.2	15.5	38.9	37.7	0.6
Farms by Geography	2,448	3.7	14.0	39.5	42.6	0.2
Family Distribution by Income Level	283,946	21.8	16.3	20.0	41.8	0.0
Household Distribution by Income Level	490,196	26.1	16.2	17.2	40.4	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$84,589	Median Housing Value			\$249,469
			Median Gross Rent			\$978
			Families Below Poverty Level			8.1%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

* The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Minneapolis MSA was \$84,589. Based on this information low-income families earned less than \$42,295 and moderate-income families earned less than \$67,671. The median housing value in the AA is \$249,469 while the NAR median sales price of a single-family home was \$288,600 in calendar year 2019 and increased to \$354,800 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$1,057 for a low-income borrower and \$1,692 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,339. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Minneapolis MSA, the overall household poverty level was 8.1 percent.

Economic Data

According to Moody's Analytics, dated November 2021, technology, financial services, and the University of Minnesota are key economic drivers. The metropolitan area has significant strengths coming out of the pandemic with limited exposure to the segments of the economy hit hardest by the pandemic. A highly educated workforce along with major research institutions and corporate headquarters has positioned the metropolitan area to recover fully. However, like several other large metropolitan areas, Minneapolis has experienced a severe worker shortage particularly within the healthcare sector. Continued strong recruitment and offerings seek to offset the trend. An increase in remote-work trends have led to a net outflow of white-collar workers

from the city as well. Major employers include Fairview Health System, Allina Health System, Target Corp., the University of Minnesota, and HealthPartners.

According to the U.S. BLS, the unemployment rate in January 2019 was 3.7 percent while the unemployment rate in December 2021 was 2.4 percent. Pandemic-related unemployment peaked at 11.6 percent in May 2020.

Community Contacts

The OCC reviewed four community contacts completed during the evaluation period with organizations located throughout the Minneapolis MSA. The community contacts are organizations focused on areas such as affordable housing, small business development, and community services. The most prevalent need identified by most contacts was affordable housing. Contacts noted that Minnesota faces a significant housing shortage, especially for LMI residents. Housing costs continue to increase and were exacerbated by the economic impact of the COVID-19 pandemic. Even with available assistance, homeowners struggle to save for down payments and closing costs. The Twin Cities metropolitan area is doing well economically. Unemployment is low and some businesses experience difficulties finding employees. Economic growth has caused an affordable housing crisis where home prices are high, which makes it difficult for lower income families to afford a home. Instead, residents are forced to move into the suburbs further from their jobs in search of affordable housing.

Contacts indicated there are numerous opportunities for local banks include homebuyer education programs, and down payment and closing cost assistance. There is also a need for funding for affordable housing, particularly the development cost on the front end to build affordable housing, along with applicable CRA qualified investments and subsidized activities.

Other identified needs include:

- Affordable housing including increased housing stock
- Home rehabilitation lending programs
- Gap financing and down payment assistance
- Financial literacy and education initiatives to gradually improve the creditworthiness of LMI borrowers in the area

Scope of Evaluation in Minnesota

The Minneapolis MSA received a full-scope review. There were no other AAs within the state of Minnesota.

Within the Lending Test for the Minneapolis MSA, mortgage lending received more weight than small business lending due to a larger volume of mortgage loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Minneapolis MSA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Minneapolis MSA	235	46	0	281

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Minneapolis MSA	107,556	9,078	0	116,634

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of less than 0.1 percent. The bank ranked 62nd among 70 depository financial institutions placing it in the top 88 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.1 percent based on the number of home mortgage loans originated or purchased. The bank ranked 98th among 572 home mortgage lenders in the AA, which placed it in the top 18 percent of lenders. The top three lenders with a combined market share of 20.3 percent were U.S. Bank, National Association (8.5 percent), Wells Fargo Bank, National Association (6.3 percent), and Bell Bank (5.5 percent).

According to peer small business data for 2021, the bank had a market share of less than 0.1 percent based on the number of small loans to businesses originated or purchased. The bank ranked 58th among 181 small business lenders in the AA, which placed it in the top 33 percent of lenders. The top three lenders with a combined market share of 52.6 percent were American Express National Bank (18.2 percent), U.S. Bank, National Association (18 percent), and Wells Fargo Bank, National Association (16.3 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

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

Small Loans to Businesses

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

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

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

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

When arriving at our conclusions, we considered the disparity between incomes and housing prices, especially given increased competition and home value appreciation driven by historically low mortgage rates during the pandemic, the bank's relative success in lending to LMI borrowers relative to other lenders in the AA, and the bank's limited operations in the AA. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

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

Small Loans to Businesses

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

When determining the conclusion in this AA, we considered the fact that 19.6 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate.

The bank did not collect or consider the gross annual revenues in the underwriting of 23.9 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but was below the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

The institution has made few, if any, CD loans. CD lending had a neutral impact on the Lending Test conclusion given the bank's limited operations within the AA.

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

The bank made did not make any CD loans throughout the evaluation period in the Minneapolis MSA.

Product Innovation and Flexibility

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank made 32 PPP loans totaling \$4.2 million throughout 2020 and 2021. Of those PPP loans, two loans totaling \$168,726 were located in either a low- or moderate-income census tract.

INVESTMENT TEST

The institution’s performance under the Investment Test in Minnesota is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The institution had an excellent level of qualified CD investment and grants, though rarely in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Minneapolis MSA	1	2,256	13	1,070	14	100	3,326	100	1	541

* 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 bank made 13 investments totaling \$1.1 million during the evaluation period, which includes 12 qualifying grants and donations totaling \$59,700 to approximately seven organizations and one unfunded and binding commitment totaling \$541,000. The dollar volume of current- and prior-period investments represented 128.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume, 98 percent of investments and donations supported affordable housing, 1.1 percent supported community services to LMI individuals, and 0.9 percent supported economic development. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB invested \$1 million in a LIHTC fund used to construct approximately one unit of housing available to LMI families within the AA. CNB’s investment was part of a larger fund that created additional affordable housing units.

- CNB made multiple donations totaling \$10,000 to a CDFI that provides affordable housing and consumer education on repairing foreclosed properties in LMI neighborhoods within the AA.
- CNB made multiple donations totaling \$16,500 to a community service organization that supports affordable housing services for LMI individuals with mental illness within the AA.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Minneapolis MSA	100.0	1	100.0	0	0	100.0	0	0	9.7	19.2	37.4	33.2	0.5

* Totals may not equal 100.0 percent due to rounding.

** The NA category consists of geographies that have not been assigned an income classification

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

The bank did not operate any branches in LMI geographies. Examiners gave positive consideration on the accessibility of service delivery systems based on the bank’s good geographic distribution of lending in the Minneapolis MSA and the presence of a deposit-taking ATM that was accessible 24 hours per day, seven days per week.

CNB had several ADS including an ATM, telephone banking, OLB, and mobile banking options. CNB had one deposit taking ATM in the AA during the evaluation period.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Minneapolis MSA	0	0	0	0	0	0	0

* The NA category consists of geographies that have not been assigned an income classification

The bank did not permanently 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 LMI geographies and/or individuals. The single branch within the Minnesota MSA was temporarily closed on March 23, 2020, due to the COVID-19 pandemic and did not reopen during the

evaluation period. While in operation, the branch operated 9:00 a.m. to 4:00 p.m. Monday through Friday. The branch was permanently closed in January 2022.

Community Development Services

The institution provides a relatively high level of CD services.

CNB employees provided 43 qualified CD service activities to approximately three organizations with 98 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 41 of these activities with one employee providing 84 service hours. The bank's assistance was responsive to identified needs in the AA, particularly community services to LMI individuals.

Service activity examples during the evaluation period include:

- An employee served on the board of an organization that provides support to those with mental illnesses and to the long-term homeless population. The employee provided fundraising and governance expertise totaling 84 hours of service during the evaluation period.
- An employee volunteered with a local organization that provides social services to LMI children. This employee managed targeted programing totaling eight hours across the evaluation period.

State of Nevada

CRA rating for the state of Nevada: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good lending performance based on good geographic distributions of loans, adequate borrower distribution of loans, excellent responsiveness when considering lending activity, and leadership in making CD loans, which had a positive impact on the Lending Test rating.
- Excellent investment performance based on an excellent level of investments and donations and adequate responsiveness to identified community development needs
- Adequate service performance based on reasonably accessible service delivery systems and an adequate level of CD services.

Description of Institution's Operations in Nevada

The bank delineated multiple AAs within the state of Nevada. They include the entire Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA) and multiple AAs within the Reno-Carson City-Fernley, NV CSA (Reno CSA), which were combined for presentation and analysis purposes. Refer to Appendix A for a list of the counties reviewed.

CNB had \$1.8 billion in deposits in Nevada representing 2.8 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated seven branches and seven ATMs, all of which were deposit-taking, within the rating area, representing 9.5 percent of total bank branches and 9.3 percent of total ATMs. The bank originated and purchased approximately \$589.8 million in home mortgage and small business loans within Nevada representing 2.9 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 48 FDIC-insured institutions operating 396 branches in the AA. CNB ranked 12th in deposit market share with 1.4 percent. The top three banks by deposit market share are Wells Fargo Bank, National Association with 18.7 percent, Bank of America, National Association with 17 percent, and Wells Fargo National Bank West with 11.5 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

Las Vegas MSA

CNB had \$1.4 billion in deposits in the Las Vegas MSA representing 2 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated four branches and four ATMs, all of which were deposit-taking, within the rating area, representing 5.4 percent of total bank branches and 5.3 percent of total ATMs. The bank originated and purchased approximately \$410.2 million in home mortgage and small business loans within the Las Vegas MSA representing 2 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 42 FDIC-insured institutions operating 300 branches in the AA. CNB ranked 11th in deposit market share with 1.3 percent. The top three banks by deposit market share are Bank of America, National Association with 18.6 percent, Wells Fargo Bank, National Association with 18.1 percent, and Wells Fargo National Bank West with 16.6 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Las Vegas MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Las Vegas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	137,264	3.8	20.8	38.7	36.1	0.6
Farms by Geography	1,912	2.1	19.7	39.9	38.2	0.2
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$169,213
			Median Gross Rent			\$1,032
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS and 2021 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>						

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Las Vegas MSA was \$59,993. Based on this information low-income families earned less than \$29,997 and moderate-income families earned less than \$47,994. The median housing value in the AA is \$169,213 while the NAR median sales price of a single-family home was \$306,000 in calendar year 2019 and increased to \$397,000 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$750 for a low-income borrower and \$1,200 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$908. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Las Vegas MSA, the overall family poverty level was 11.9 percent.

Economic Data

According to Moody's Analytics, dated July 2021, the Las Vegas economy has recovered well from the pandemic, with tourism returning to pre-pandemic levels. Nevada's economy is primarily driven by tourism as well as being a haven for retirees. Housing prices are high. Leisure and hospitality services, professional and business services, government, education and health services, and retail trade remain important economic drivers. The largest major employers within the area continue to be Nellis Air Force Base followed by the many resorts and casinos located throughout the Las Vegas metropolitan area, especially along the Las Vegas Strip.

According to the U.S. BLS, the unemployment rate in January 2019 was 4.8 percent while the unemployment rate in December 2021 was 5 percent. Pandemic-related unemployment peaked at 31.1 percent in April 2020 and did not decline below 10 percent until April 2021. Unemployment in the Las Vegas MSA was among the highest of any MSA in the country at the onset of the COVID-19 pandemic.

Community Contacts

The OCC reviewed two community contacts completed during the evaluation period with organizations located throughout the Las Vegas MSA. The community contacts are organizations focused on small business and economic and community development. The most prevalent need identified by the contacts was small business credit access. The contact noted that COVID-19 had a significant impact on the economy of Las Vegas due to the decline in the hospitality and entertainment industries. They also indicated that Las Vegas was considered one of the fastest growing cities in regard to population and business development before the onset of the COVID-19 pandemic, but that has since changed. There has been a recovery, including the unemployment rate declining to 15 percent mid-pandemic as well as rebounding in other sectors such as travel, and growth remains higher but not as high as pre-pandemic. Businesses still desire to relocate to the Las Vegas area, and there has been an increase in inquiries from businesses wanting to move to the area, due to the lower cost of living and low property taxes.

Contacts indicated that the economy in Las Vegas will strengthen due to the number of new businesses that seek to relocate to the MSA. Contacts stated that there are numerous opportunities for banks to partner with community organizations and to establish referral programs for small business loans. Also, banks could establish loan funds for small dollar loans to businesses struggling to qualify under standard underwriting metrics. Local financial institutions are key to attracting new businesses to the Las Vegas area and meeting credit needs for start-ups and expanding businesses.

Other identified needs include:

- Small dollar loans for small businesses (\$500 - \$50,000)
- Funding for micro lending programs
- Small business term loans and lines of credit
- CDFI investments and capital for lending
- Microfinancing for smaller businesses
- Access to capital for newer and start-up businesses

Scope of Evaluation in Nevada

The Las Vegas MSA received a full-scope review. The Las Vegas MSA represented 77.7 percent of deposits, 69.5 percent of lending, and 57.1 percent of branches within Nevada. The Reno CSA received a limited-scope review.

Within the Lending Test for the Las Vegas MSA and Reno CSA, small business lending received more weight than home mortgage lending due to a larger volume of small business loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

The bank's performance under the Lending Test in Nevada is rated High Satisfactory. Performance in the limited-scope area had a neutral impact on the overall Lending Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to its deposit market rank.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Las Vegas MSA	480	898	7	1,385	68.0	73.7
Reno CSA	231	419	3	653	32.0	26.3
Total	711	1,317	10	2,038	100.0	100.0

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

Dollar Volume of Loans (000s)*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% State Loans	% State Deposits
Las Vegas MSA	256,689	153,464	59,579	469,732	71.0	73.7
Reno CSA	113,355	66,292	12,188	191,835	29.0	26.3
Total	370,044	219,756	71,767	661,567	100.0	100.0

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

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 1.3 percent. The bank ranked 11th among 42 depository financial institutions placing it in the top 31 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 103rd among 606 home mortgage lenders in the AA, which placed it in the top 17 percent of lenders. The top three lenders with a combined market share of 15.5 percent were Rocket Mortgage (7.4 percent), United Wholesale Mortgage (4.1 percent), and PennyMac Loan Services, LLC (4 percent).

According to peer small business data for 2021, the bank had a market share of 0.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked 19th among 251 small business lenders in the AA, which placed it in the top 8 percent of lenders. The top three lenders with a combined market share of 46.4 percent were American Express, National Bank (19.5 percent), Bank of America, National Association (13.7 percent), and JPMorgan Chase Bank, National Association (13.2 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans in low-income geographies was significantly below the percentage of owner-occupied homes in low-income geographies and was well below the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans.

Small Loans to Businesses

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

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

The bank's percentage of small loans to businesses in low-income geographies approximated the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and exceeded the aggregate distribution of loans.

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

When determining conclusions, examiners weighed the bank's performance compared to the aggregate distribution of loans for low-income borrowers more heavily than the demographic comparison. Examiners considered the fact that housing became increasingly unaffordable for low-income borrowers during the COVID-19 pandemic. Additionally, examiners considered the very high unemployment rate throughout 2020 and into 2021 due to the effects of the COVID-19 pandemic. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was excellent.

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage

loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

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

When determining the conclusion in this AA, we considered the fact that 43.1 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor.

The bank did not collect or consider the gross annual revenues in the underwriting of 45.4 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with gross annual revenues of \$1 million or less and was well below the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

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

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

The bank made seven CD loans totaling \$59.6 million, which represented 42.3 percent of the allocated tier 1 capital. CD loans primarily supported economic development. By dollar volume, 90.6 percent of these loans funded economic development and 9.4 percent funded revitalization and stabilization efforts.

Examples of CD loans include:

- The bank made three loans totaling \$51 million to support economic development. The loan proceeds allowed for the creation and retention of LMI jobs at a beverage distributor in Clark County, located in a moderate-income census tract.
- The bank made a loan for \$1.5 million that allowed for the creation and retention of LMI jobs at construction company that specializes in demolition, asbestos abatement, mold removal, hazardous waste removal, and emergency response located in a moderate-income census tract.

Product Innovation and Flexibility

The institution makes extensive use of innovative and flexible lending practices in order to serve AA credit needs. Throughout the evaluation period the bank made 45 SBA loans totaling \$41.7 million in the state of Nevada. Additionally, within the state of Nevada AAs, the bank made 961 PPP loans totaling \$139.9 million, of which 223 loans totaling \$35.2 million were in either a low- or moderate-income census tract.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Reno CSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance in the Reno CSA was due to weaker geographic and borrower distributions of loans. Performance differences in the limited-scope area did not impact the overall conclusion for the state of Nevada.

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

INVESTMENT TEST

The institution's performance under the Investment Test in Nevada is rated Outstanding. Performance in the limited-scope areas had a neutral impact on the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

The institution had a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Las Vegas MSA	9	11,111	53	3,349	62	56.4	14,460	58.9	6	936
Reno CSA	14	5,549	34	4,521	48	43.6	10,070	41.1	7	32
Total	23	16,660	87	7,870	110	100.0	24,530	100.0	13	968

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

* 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 bank made 53 investments totaling \$3.4 million during the evaluation period, which includes 52 qualifying grants and donations totaling \$277,783 to 20 organizations and has six unfunded and binding commitments totaling \$936,000. The dollar volume of current- and prior-period investments represented 10.3 percent of allocated tier 1 capital.

The institution exhibited adequate responsiveness to credit and community economic development needs. By dollar volume, 93.9 percent of investments and donations supported affordable housing, 5.1 percent supported community services targeted to LMI individuals, and 1 percent supported economic development. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB invested \$3 million in a LIHTC fund used to construct approximately three units of housing available to LMI families within the AA. CNB's investment was part of a larger fund that created additional affordable housing units.
- CNB made multiple donations totaling \$35,000 to an economic development organization used to provide small business support, job training, job creation and financial education to small businesses within the AA.
- CNB made multiple donations totaling \$13,000 to a community service organization to support education by providing books, clothing, shoes, and backpacks for youth in schools that predominantly serve LMI students within the AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Reno CSA is consistent with the full-scope area. Performance in the limited-scope areas did not impact the overall Investment Test conclusion.

SERVICE TEST

The bank's performance under the Service Test in Nevada is rated Low Satisfactory. Performance in the limited-scope areas had a neutral impact on the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA was adequate.

Retail Banking Services

Distribution of Branch Delivery System*													
Assessment Area	Deposits		Branches						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA
Las Vegas MSA	77.8	4	57.1	0	25.0	25.0	50.0	0	5.0	25.3	39.2	30.3	0.2
Reno CSA	22.2	3	42.9	0	0	66.7	33.3	0	7.0	19.3	41.5	31.1	1.1

Totals may not equal 100.0 percent due to rounding.

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

** The NA category consists of geographies that have not been assigned an income classification

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA. CNB's distribution of branches in moderate-income geographies approximated the percentage of the population living within those geographies. There were no branches in low-income geographies. Examiners placed more emphasis on the bank's performance in moderate-income geographies due to the low population in low-income geographies.

CNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. CNB had four ATMs in the AA, all of which were deposit-taking. ATMs were located at branch locations.

Distribution of Branch Openings/Closings*							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Las Vegas MSA	0	0	0	0	0	0	0
Reno CSA	0	0	0	0	0	0	0

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

** The NA category consists of geographies that have not been assigned an income classification

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. CNB maintained standard business hours, from 9:00 a.m. to 5:00 p.m. Monday to Friday, and offered traditional banking products for all branch locations in the AA. Of the four branches in the AA three had drive-thru facilities, including the branch located in the moderate-income geography. CNB maintained the same banking hours for lobby and drive-through facilities.

Community Development Services

The institution provides a relatively high level of CD services.

CNB employees provided 119 qualified CD service activities to approximately 12 organizations with 392 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 92 of these activities with five employees providing 155 service hours. The bank’s assistance primarily focused on community service activities marketed to LMI individuals and affordable housing.

Service activity examples during the evaluation period include:

- Seven bank employees supported applications for grants from the FHLB AHP and AHEAD programs to support affordable housing projects and economic development initiatives. These employees dedicated 192 hours to the submission of six AHP grant applications, of which two were successful, resulting in the FHLB awarding \$1.5 million in grant funds to those affordable housing projects. One employee dedicated three additional hours to one AHEAD grant application.
- An employee participated in a CNB-run program that provides financial literacy lessons to primarily LMI individuals.
- An employee served on the board of an organization that provides affordable housing and financial education to LMI individuals and families.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Service Test in the Reno CSA is consistent with, the bank’s overall performance under the Service Test in the full-scope area and supports the overall Service Test conclusion.

State of New York

CRA rating for the state of New York: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Poor lending performance based on very poor geographic distributions of loans, adequate borrower distribution of loans, and a negative impact from making few, if any, CD loans.
- Excellent investment performance based on an excellent level of investments and donations, including complex investments, and responsiveness to identified needs for affordable housing.
- Poor service performance based on unreasonably inaccessible retail delivery systems and an adequate level of CD services that were responsive to identified community needs.

Description of Institution's Operations in New York

CNB delineated two AAs in the state of New York. Both AAs are a part of the New York-Newark-Jersey City, NY-NJ-PA MSA (New York MSA) and were combined for presentation and analysis purposes. Refer to Appendix A for a list of the counties reviewed.

New York MSA

CNB had \$15.4 billion in deposits in the New York MSA. As of December 31, 2021, the bank operated six branches and eight ATMs, all of which were deposit-taking, within the rating area, representing 8.1 percent of total bank branches and 10.7 percent of total ATMs. The bank originated and purchased approximately \$2 billion in home mortgage and small business loans within the New York MSA representing 9.8 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 97 FDIC-insured institutions operating 1,316 branches in the AA. CNB ranked 15th in deposit market share with 0.8 percent. The top three banks by deposit market share were JPMorgan Chase Bank, National Association with 40.4 percent, Goldman Sachs Bank USA with 11.3 percent, and The Bank of New York Mellon with 9.6 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

CNB had a significant volume (\$9.6 billion) of external sweep accounts, unrelated to residents or businesses in New York, attributed to this AA. These deposits are related to brokerage accounts held at RBC Wealth Management. Deposits in the New York MSA, net of sweeps, total \$5.8 billion, representing 8.8 percent of the bank's total deposits as of June 30, 2021. Net of sweep deposits, CNB's rank would be 20th, with a deposit market share of approximately 0.3 percent.

The following table provides a summary of the demographics, including housing, business, and economic information for the New York MSA.

Table A – Demographic Information of the Assessment Area**Assessment Area: New York MSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,656	8.6	24.9	36.4	27.8	2.4
Population by Geography	7,080,751	10.1	26.6	35.1	27.9	0.4
Housing Units by Geography	2,917,021	8.9	24.3	32.7	33.8	0.4
Owner-Occupied Units by Geography	1,190,963	2.3	15.8	47.3	34.3	0.2
Occupied Rental Units by Geography	1,425,731	15.0	31.7	21.1	31.7	0.5
Vacant Units by Geography	300,327	5.7	23.0	29.6	41.3	0.4
Businesses by Geography	1,110,156	5.9	17.7	30.4	43.8	2.2
Farms by Geography	10,369	3.5	20.6	45.4	29.6	0.8
Family Distribution by Income Level	1,601,496	27.2	16.1	17.8	38.8	0.0
Household Distribution by Income Level	2,616,694	28.8	14.3	15.9	41.0	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY	\$108,193	Median Housing Value				\$591,087
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ	\$67,560	Median Gross Rent				\$1,450
		Families Below Poverty Level				11.9%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The median family income ranged from a \$67,560 in the New York-Jersey City-White Plains, NY-NJ MD to \$108,193 in the Nassau County-Suffolk County, NY MD. Based on this information, low-income families earned less than \$33,780 to \$54,097 and moderate-income families earned less than \$54,048 to \$86,554. The median housing value in the AA is \$591,087 while the NAR median sales price of a single-family home was \$386,500 in calendar year 2019 and increased to \$535,800 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was between \$845 and \$1,352 for low-income borrowers and between \$1,351 and \$2,164 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$3,173. LMI borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the New York MSA, the overall family poverty level was 11.9 percent.

Economic Data

According to Moody's Analytics, dated November 2021, the New York economy is struggling to recover from the pandemic recession. Recent progress has been noted, but both the public sector and education sectors remain weak. The New York area is further behind its pre-pandemic employment peak than any other top 50 metro area or division in the country. Housing prices are beginning to increase, and housing permits have been stagnant. Education and health services, professional and business services, and financial activities are important drivers

of the economy. The largest employers are Montefiore Health System, Mount Sinai Health System, JPMorgan Chase, Bank of America, National Association, and New York Presbyterian Healthcare System.

According to the U.S. BLS, the New York-Jersey City-White Plains, NY-NJ MD had an unemployment rate of 4.4 percent in January 2019 and 5.4 percent in December 2021. The Nassau County-Suffolk County, NY MD had an unemployment rate of 3.9 percent in January 2019 and 2.7 percent in December 2021. Pandemic-related unemployment peaked at 18.6 percent in May 2020 in the New York-Jersey City-White Plains, NY-NJ MD and at 18.2 percent in April 2020 in the Nassau County-Suffolk County, NY MD. Pandemic-related unemployment remained above 10 percent in the New York-Jersey City-White Plains, NY-NJ MD until March 2021.

Community Contacts

The OCC reviewed six community contacts completed during the evaluation period with organizations located throughout the New York MSA. The community contacts are organizations focused on areas such as affordable housing, small business development, community services, and policy and research. The community contacts identified affordable housing as the greatest concern as housing and rental price increases continue to outpace wage growth across the MSA. Affordable rental housing is particularly necessary in high-cost metropolitan areas such as New York City, where most of residents remain renters. Often these renters experience a high rent burden, impeding the ability to save for a mortgage down payment. Multifamily lending is also an identified need in the MSA and requires complex funding requiring multiple sources due to high property values. For homeowners across the MSA, affordable mortgages with down payment assistance and home improvement loans are needed for LMI families to purchase and renovate homes. The contacts identified a need to address affordable rents for low-income tenants, many of whom are on public assistance or elderly. Job creation is an additional need as experienced workers are aging out of the workforce and there are insufficient replacement workers.

The community contacts indicated opportunities exist for financial institutions to finance affordable housing and smaller multifamily housing loans, offer additional credit access for small business, financial literacy education, open additional branches in underserved communities, and to build relationships with small businesses. They also indicated the need for additional financial resources from private entities in the area to allow for more research on housing discrimination in the area. Problems continue to exist with foreclosure and defaults. Communities have problems with predatory lending in low-income communities and low-income communities need equal access to credit as well as bank branches in their neighborhoods.

For small businesses, there is an increased need especially for small-scale businesses that struggle most to access capital. In the high-cost areas across the MSA, it is difficult for businesses to survive due to rising commercial real estate lease costs and large chains entering local retail markets. Community organizations seek partner banks to provide access to technical training and leadership.

Other identified needs include:

- Affordable senior housing and shelter solutions for the homeless
- Access to affordable banking products and services, including low-cost checking and savings products and credit repair products
- Financial literacy and education for both consumers and small businesses
- Small business loans
- Affordable small dollar emergency credit
- Homebuyer education and counseling
- Support for youth after-school programs
- Job training and resources

Scope of Evaluation in New York

The New York MSA received a full-scope review. There were no other AAs within the state of New York.

Within the Lending Test for the New York MSA, small business lending received substantially more weight than home mortgage lending due to a larger volume of small business loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's performance under the Lending Test in New York is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New York MSA was poor.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to their deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
New York MSA	848	2,728	1	3,577
BSRA			3	3
Total	848	2,728	4	3,580

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
New York MSA	1,572,946	385,320	1,250	1,959,516
BSRA			7,631	7,631
Total	1,572,946	385,320	8,881	1,967,147

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 0.8 percent. The bank ranked 15th among 97 depository financial institutions placing it in the top 16 percent of banks. Net of external sweep accounts, the bank would have an approximate market share of 0.3 percent and rank of 20th among 97 depository institutions, placing it in the top 21 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.2 percent based on the number of home mortgage loans originated or purchased. The bank ranked 70th among 431 home mortgage lenders in the AA, which placed it in the top 17 percent of lenders. The top three lenders with a combined market share of 24.6 percent were JPMorgan Chase Bank, National Association (9.2 percent), Wells Fargo Bank, National Association (9 percent), and Rocket Mortgage (6.5 percent).

According to peer small business data for 2021, the bank had a market share of 0.4 percent based on the number of small loans to businesses originated or purchased. The bank ranked 25th among 353 small business lenders in the AA, which placed it in the top 8 percent of lenders. The top three lenders with a combined market share of 57.8 percent were American Express National Bank (28.7 percent), JPMorgan Chase Bank, National Association (22.4 percent), and Bank of America, National Association (6.7 percent).

Distribution of Loans by Income Level of the Geography

The bank exhibited a very poor geographic distribution of loans in its AA. Examiners placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans in low-income geographies was well below both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of owner-occupied homes in moderate-income geographies and the aggregate distribution of loans.

Small Loans to Businesses

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

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

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

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners identified conspicuous gaps in LMI geographies for both home mortgage and small business lending resulting from the exclusion of Brooklyn from the original AA. After expanding the AA, the remaining gaps are explained by the bank's limited volume of home mortgage loans in relation to the number of census tracts in the AA, the bank's limited operations in the AA compared to other lenders, and the bank's very poor geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

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

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

Small Loans to Businesses

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

When determining the conclusion in this AA, we considered the fact that 54.6 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate

The bank did not collect or consider the gross annual revenues in the underwriting of 55 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was significantly below the percentage of businesses with gross annual revenues of \$1 million or less and was well below the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

The institution has made few, if any, CD loans. CD lending had a negative effect on the Lending Test rating given the bank's capacity to lend and opportunities within the AA.

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

The bank made one CD loan totaling \$1.3 million, which represented 0.2 percent of the adjusted allocated tier 1 capital

An example of a CD loans is:

- The bank originated a \$1.3 million loan to support economic development. The borrower operates as a restaurant, wholesaler, and manufacturer specializing in Italian pasties and desserts. The business is located in a moderate-income geography and provides jobs to LMI individuals.

CNB originated three loans totaling \$7.6 million to organizations in the BSRA that have a purpose, mandate, or function to serve the bank's AA. Lending in the BSRA represents 1.3 percent of allocated tier 1 capital in the state of New York. These loans included a \$631,000 PPP loan to a conservancy non-profit organization, a \$5 million line of credit to a CDFI that supports small businesses throughout the state of New York, and a \$2 million loan to a school that supports low- and moderate-income students.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Throughout the evaluation period, the bank made 10 SBA loans totaling \$13.2 million in the New York

MSA. CNB made 2,122 PPP loans totaling \$231.2 million within the New York MSA. Of those PPP loans, 62 loans, totaling \$9.7 million, were in either a low- or moderate-income census tract.

INVESTMENT TEST

The institution’s performance under the Investment Test in the New York MSA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MSA	13	17,081	128	35,629	141	100	52,710	100	8	20,623

* 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 bank made 128 investments totaling \$35.6 million during the evaluation period, which includes 123 qualifying grants and donations totaling \$1.5 million to approximately 56 organizations and has eight unfunded and binding commitments totaling \$20.6 million. The dollar volume of current- and prior-period investments represented 8.7 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community needs for affordable housing. By dollar volume, 93.7 percent of investments and donations supported affordable housing, 4.1 percent supported economic development, and 2.1 percent supported community services to LMI individuals. The institution makes use of innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB invested \$10 million in a LIHTC fund used to construct approximately 10 units of affordable housing available to LMI families within the AA. CNB’s investment was part of a larger fund that created additional affordable housing units.
- CNB made multiple donations totaling \$27,500 to a community service organization to support affordable housing, community service centers, housing counseling, workforce development, and job placement services for 100 homeless individuals within the AA.
- CNB invested \$1 million in a SBIC fund used to invest in approximately 30 small businesses within the AA.

SERVICE TEST

The bank’s performance under the Service Test in New York is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New York MSA was poor.

Retail Banking Services

Distribution of Branch Delivery System														
Assessment Area	Deposits	Branches			Location of Branches by Income of Geographies (%)					Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA						% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA**	Low	Mod	Mid	Upp	NA	
New York MSA	100.0	6	100.0	0	0	0	83.3	16.7	10.1	26.6	35.1	27.9	0.4	

* Totals may not equal 100.0 percent due to rounding.

** The NA category consists of geographies that have not been assigned an income classification

Delivery systems are unreasonably inaccessible to significant portions of the AA, LMI geographies and/or LMI individuals. The bank does not operate any branches in LMI geographies.

CNB had several ADS including ATMs, telephone banking, OLB, and mobile banking options. The bank had eight ATMs in the AA, all of which were deposit-taking. Of the eight ATMs, six were located at branch locations.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
New York MSA	4	1	0	0	0	3	0

* The NA category consists of geographies that have not been assigned an income classification

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 LMI geographies or to LMI individuals. CNB closed one branch and opened four branches in upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AA, particularly LMI geographies and/or individuals. CNB maintained standard business hours, Monday through Friday from 8:30 a.m. to 5:00 p.m., at all branches and offered traditional banking products for all branch locations in the AA.

Community Development Services

The institution provides an adequate level of CD services.

CNB employees provided 344 qualified CD service activities to approximately 14 organizations with 603 qualified hours within this AA during the evaluation period. Leadership is evident through board or committee participation in 313 of these activities with seven employees providing 548 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with community service marketed to low- to moderate-income individuals.

Service activity examples during the evaluation period include:

- An employee served on the board of an organization that provides meals to elderly, low-income New York citizens. The employee provided fundraising and governance expertise for 63 hours across the evaluation period.
- An employee served on the board of an organization that is dedicated to supporting and empowering the economically disadvantaged residents of northern Manhattan neighborhood struggling with affordable housing and the impacts of gentrification. The employee provided fundraising and governance expertise for more than 50 hours across the evaluation period.
- An employee served on the board of an organization as treasurer and secretary that allows low-income young adults to gain access to various art education programs. The employee provided 112 hours of service during the evaluation period that included fundraising, financial management of programming, and audit and tax compliance.

State of Tennessee

CRA rating for the state of Tennessee: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good lending performance based on good geographic distribution of loans, adequate borrower distributions of loans, excellent responsiveness when considering lending activity, and leadership in making CD loans, which had a neutral impact on the Lending Test rating.
- Excellent investment performance based on an excellent level of investments and donations and responsiveness to identified needs for affordable housing.
- Adequate service performance based on reasonably accessible retail delivery systems and an adequate level of CD services.

Description of Institution's Operations in Tennessee

CNB delineated one AA within the state of Tennessee. It included a portion of the Nashville-Davidson-Murfreesboro-Franklin MSA (Nashville MSA). Refer to Appendix A for a list of the counties reviewed.

Nashville MSA

CNB had \$728.7 million in deposits in the Nashville MSA representing 1.1 percent of the bank's total deposits as of June 30, 2021. As of December 31, 2021, the bank operated one branch and no ATMs within the rating area, representing 1.4 percent of total bank branches. The bank originated and purchased approximately \$330.2 million in home mortgage and small business loans within the Nashville MSA representing 1.6 percent of total bank loan originations and purchases. According to FDIC deposit-market share data, as of June 30, 2021, there were 34 FDIC-insured institutions operating 204 branches in the AA. CNB ranked 11th in deposit market share with 1.3 percent. The top three banks by deposit market share are Bank of America, National Association with 21.3 percent, Pinnacle Bank with 19.6 percent, and Regions Bank with 13.4 percent. In addition to FDIC-insured institutions, this area is served by numerous credit unions, mortgage lenders, and mortgage brokers.

The following table provides a summary of the demographics, including housing, business, and economic information for the Nashville MSA.

Table A – Demographic Information of the Assessment Area**Assessment Area: Nashville MSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	161	17.4	27.3	30.4	23.0	1.9
Population by Geography	658,506	14.1	28.0	33.2	24.4	0.2
Housing Units by Geography	290,647	13.8	27.2	33.1	25.9	0.0
Owner-Occupied Units by Geography	143,045	7.7	21.0	38.0	33.3	0.0
Occupied Rental Units by Geography	121,166	19.9	34.2	28.3	17.6	0.0
Vacant Units by Geography	26,436	19.6	28.3	28.3	23.7	0.0
Businesses by Geography	87,529	12.6	22.8	25.3	37.7	1.6
Farms by Geography	1,244	9.3	22.8	33.4	33.4	1.1
Family Distribution by Income Level	146,749	26.1	17.9	19.2	36.7	0.0
Household Distribution by Income Level	264,211	26.6	18.2	18.2	37.0	0.0
Median Family Income MSA - 34980 Nashville-Davidson- -Murfreesboro--Franklin, TN MSA	\$66,441	Median Housing Value				\$201,214
		Median Gross Rent				\$887
		Families Below Poverty Level				13.8%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

* The NA category consists of geographies that have not been assigned an income classification.

The OCC evaluated the disparity between the median incomes of families within the AA and the cost of housing. The weighted average median family income for the Nashville MSA was \$66,441. Based on this information low-income families earned less than \$33,221 and moderate-income families earned less than \$53,153. The median housing value in the AA is \$201,124 while the NAR median sales price of a single-family home was \$275,000 in calendar year 2019 and increased to \$349,500 in fourth quarter 2021. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$831 for a low-income borrower and \$1,329 for a moderate-income borrower. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes or additional monthly expenses, the monthly mortgage payment for a home at the AA median housing value would be \$1,080. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Nashville MSA, the overall family poverty level was 13.8 percent.

Economic Data

According to Moody's Analytics, dated August 2021, indicates that manufacturing, state government, and tourism are key economic drivers. The metropolitan area has significant strengths coming out of the COVID-19 pandemic including a favorable business tax structure, a large concentration of prime-age workers, and net migration into the area. As such, housing prices have accelerated and are some of the highest of southern metro areas. Supply chain shortages with semiconductor shortages have disrupted the economy including with auto manufacturing plants. The return of tourism should also bolster the local economy. Major employers include

Vanderbilt University Medical Center, Nissan, HCA Inc, Vanderbilt University, and Saint Thomas Health Services.

According to the U.S. BLS, the unemployment rate in January 2019 was 2.9 percent while the unemployment rate in December 2021 was 2.5 percent. Pandemic-related unemployment peaked at 15.3 percent in April 2020.

Community Contacts

The OCC reviewed four community contacts completed during the evaluation period with organizations located throughout the Nashville MSA. The community contacts are organizations focused on areas such as affordable housing, small business development, economic development, financial education, community development and revitalization. The most prevalent need identified by the contacts was affordable housing. Community contacts noted the high cost of the housing market in the MSA and identified a need to develop more affordable rental and homeownership options. The contacts attributed the loss of affordable housing to the booming real estate resale market and buyer's willingness to pay more than appraised value for housing in the area, driven by low mortgage rates during the COVID-19 pandemic. One of the community contacts stated that affordable housing is a concern and despite an increase in the number of multi-family projects, high rents in these new developments remain unaffordable for LMI individuals and families.

One community contact stated there is opportunity for banks to be more involved with increasing financial education programming and helping local entrepreneurs to build more small businesses in the downtown area. Additional opportunities in the MSA include affordable credit products, assistance with grants, workforce development, financial literacy, credit, low-cost small dollar programs, small business lines of credit, and financial education and counseling.

There are also opportunities in the AA for the bank to participate in various charitable organizations as well as those focused on affordable housing and economic development.

Other identified needs include:

- Economic development lending
- Affordable housing including increased housing stock
- Loans to rehabilitate or construct affordable housing, community facilities, and the environmental clean-up or redevelopment of industrial sites
- Financial literacy, including credit and homebuyer education counseling
- Technical assistance for organizations facilitating affordable housing construction, rehabilitation, or development
- Technical assistance and funding for small business start-ups

Scope of Evaluation in Tennessee

The Nashville MSA received a full-scope review. There were no other AAs within the state of Tennessee.

Within the Lending Test for the Nashville MSA, small business lending received more weight than home mortgage lending due to a larger volume of small business loans within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Nashville MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs when considering CNB's lending market ranks as compared to its deposit market rank.

Number of Loans				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Nashville MSA	383	779	2	1,164

Dollar Volume of Loans (\$000s)				
Assessment Area	Home Mortgage	Small Business	Community Development	Total
Nashville MSA	249,293	80,908	6,342	336,543

According to FDIC deposit data as of June 30, 2021, the bank had a deposit market share of 1.3 percent. The bank ranked 11th among 34 depository financial institutions placing it in the top 33 percent of banks.

According to peer mortgage data for 2021, the bank had a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranked 59th among 739 home mortgage lenders in the AA, which placed it in the top 8 percent of lenders. The top three lenders with a combined market share of 12.5 percent were Rocket Mortgage (5.5 percent), U.S. Bank, National Association (3.7 percent), and Pinnacle Bank (3.3 percent).

According to peer small business data for 2021, the bank had a market share of 1.5 percent based on the number of small loans to businesses originated or purchased. The bank ranked 17th among 192 small business lenders in the AA, which placed it in the top 9 percent of lenders. The top three lenders with a combined market share of 39.3 percent were American Express National Bank (17 percent), Pinnacle Bank (11.5 percent), and JPMorgan Chase Bank, National Association (10.9 percent).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied homes in low-income geographies and the aggregate distribution of loans. The percentage of home mortgage loans in moderate-income geographies approximated the percentage of owner-occupied homes in moderate-income geographies and exceeded the aggregate distribution of loans.

Small Loans to Businesses

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

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

The bank's percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of loans. The bank's percentage of small loans to businesses in moderate-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate distribution of loans.

Within the Nashville MSA, CNB made 597 PPP loans totaling \$51.5 million, of which 239 loans totaling \$26.5 million were originated in either a low- or moderate-income census tract.

Lending Gap Analysis

The OCC analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the AA. Examiners did not identify any unexplained, conspicuous gaps in lending in LMI geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate borrower distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

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

The bank's percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but approximated the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers was significantly below both the percentage of moderate-income families and the aggregate distribution of loans.

Small Loans to Businesses

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

When determining the conclusion in this AA, we considered the fact that 51.2 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was good.

The bank did not collect or consider the gross annual revenues in the underwriting of 52.2 percent of its small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was

well below both the percentage of businesses with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to businesses. Consideration of the bank's PPP lending had a positive effect on the OCC's assessment of the bank's Distribution of Loans by Income Level of the Borrower.

Community Development Lending

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

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

The bank originated two CD loans totaling \$6.3 million, which represented 8.4 percent of the allocated tier 1 capital. The CD loans funded revitalization and stabilization efforts. Both CD loans were PPP loans that enabled the retention of LMI jobs in a low-income census tract.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Within the Nashville MSA, CNB made 597 PPP loans totaling \$51.5 million.

INVESTMENT TEST

The institution's performance under the Investment Test in Tennessee is rated outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Nashville MSA	4	5,334	21	565	25	100	5,899	100	2	271

* 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 bank made 21 investments totaling \$565,000 during the evaluation period, which includes 20 qualifying grants and donations totaling \$65,408 to approximately seven organizations. The dollar volume of current- and prior-period investments represented 7.8 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to identified community development needs for affordable housing. By dollar volume 92 percent of investments supported affordable housing, 4.5 percent funded community

services to LMI individuals, and 3.5 percent supported economic development. The bank made limited use of innovative and/or complex investments to support CD initiatives.

Examples of CD investments in the AA include:

- CNB made a \$500,000 investment in a multi-investor LIHTC fund that supported affordable housing in the Nashville MSA.
- CNB donated \$20,000 to an organization that focuses on providing loans and business resources to small businesses for economic development.
- CNB donated \$14,200 to an organization that focuses on providing essential health and wellness programming to underserved women and girls in the community.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Nashville MSA was good.

Retail Banking Services

Distribution of Branch Delivery System													
Assessment Area	Deposits			Branches					Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA
Nashville MSA	100.0	1	1	100.0	0	0	0	0	14.1	28.0	33.2	24.4	0.2

Totals may not equal 100.0 percent due to rounding.

* The NA category consists of geographies that have not been assigned an income classification

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA given the bank’s single branch within the AA. The bank operated one branch in a low-income geography.

CNB had several ADS including OLB, and mobile banking options. CNB operated no ATMs in the AA.

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

* The NA category consists of geographies that have not been assigned an income classification

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

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

Monday through Friday from 9:00 a.m. to 4:00 p.m. and offered traditional banking products at the single branch in the AA.

Community Development Services

The institution provided an adequate level of CD services.

CNB employees provided two qualified CD service activities to one organization with ten qualified hours within this AA during the evaluation period. Leadership is evident through Board or committee participation in this activity. The bank's assistance was responsive to identified needs in the AA, particularly with community services to LMI individuals. The employee served on the board of an organization that primarily serves LMI youth. The board member's duties include the following: raising money, bringing contacts to the organization, and acting as an ambassador to the community.

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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, community development loans, community development investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Washington-Arlington-Alexandria, DC-VA-MD-WV MSA (Washington MSA)	Full-Scope	DC: District of Columbia VA: Fairfax County
States		
California		
Los Angeles-Long Beach, CA CSA (Los Angeles CSA)	Full-Scope	Los Angeles, Orange, Riverside, San Bernadino, Ventura Counties
San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA)	Limited Scope	San Diego County
San Jose-San Francisco-Oakland, CA CSA (San Francisco CSA)	Limited Scope	Alameda, Contra Costa, San Francisco, San Mateo, Santa Clara Counties
Santa Maria-Santa Barbara, CA MSA (Santa Barbara MSA)	Limited Scope	City of Santa Barbara
Florida		
Miami-Fort Lauderdale-Pompano Beach, FL MSA (Miami MSA)	Full-Scope	Miami-Dade County
Georgia		
Atlanta-Sandy Springs-Roswell MSA (Atlanta MSA)	Full-Scope	Fulton, Dekalb Counties
Minnesota		
Minneapolis-St Paul-Bloomington MSA (Minneapolis MSA)	Full-Scope	Hennepin County
New York		
New York-Newark-Jersey City, NY-NJ-PA MSA (New York MSA)	Full-Scope	New York, Kings, Nassau, Suffolk Counties
Nevada		
Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA)	Full-Scope	Clark County
Reno-Carson City-Fernley, NV CSA (Reno CSA)	Limited Scope	Douglas, Washoe counties, Independent City of Carson City
Tennessee		
Nashville-Davidson-Murfreesboro-Franklin MSA (Nashville MSA)	Full-Scope	Davidson County

Appendix B: Summary of MMSA and State Ratings

RATINGS: City National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
City National Bank	Needs to Improve	Outstanding	Needs to Improve	Needs to Improve
MMSA or State:				
Washington MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of California	Needs to Improve	Outstanding	Needs to Improve	Needs to Improve
State of Florida	Needs to Improve	Outstanding	Needs to Improve	Needs to Improve
State of Georgia	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Minnesota	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of New York	Needs to Improve	Outstanding	Needs to Improve	Needs to Improve
State of Nevada	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Tennessee	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified

into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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
Washington MMSA	238	218,283	100.0	124,692	5.7	6.3	6.7	9.1	8.0	9.3	31.4	9.2	31.9	53.4	76.1	51.5	0.4	0.4	0.6
Total	238	218,283	100.0	124,692	5.7	6.3	6.7	9.1	8.0	9.3	31.4	9.2	31.9	53.4	76.1	51.5	0.4	0.4	0.6

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Washington MMSA	238	218,283	100.0	124,692	21.7	3.4	4.6	14.0	6.7	13.1	18.0	5.5	20.3	46.3	78.6	43.3	0.0	5.9	18.8
Total	238	218,283	100.0	124,692	21.7	3.4	4.6	14.0	6.7	13.1	18.0	5.5	20.3	46.3	78.6	43.3	0.0	5.9	18.8

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	
Washington MMSA	146	38,594	100.0	60,539	5.1	0.7	5.9	11.3	24.0	12.1	33.3	23.3	33.8	49.1	52.1	47.4	1.3	0.0	0.8	
Total	146	38,594	100.0	60,539	5.1	0.7	5.9	11.3	24.0	12.1	33.3	23.3	33.8	49.1	52.1	47.4	1.3	0.0	0.8	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Washington MMSA	146	38,594	100.0	60,539	86.4	21.9	46.6	5.1	64.4	8.5	13.7	
Total	146	38,594	100.0	60,539	86.4	21.9	46.6	5.1	64.4	8.5	13.7	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Los Angeles CSA	8,515	10,717,414	81.3	1,018,980	2.6	1.2	2.3	18.6	9.8	16.6	30.8	10.1	30.4	47.9	78.8	50.4	0.1	0.1	0.3
San Diego MSA	723	702,715	6.9	215,863	2.8	2.8	2.8	15.1	12.7	14.2	35.5	12.6	34.0	46.6	71.9	49.0	0.0	0.0	0.0
San Francisco CSA	1,129	961,921	10.8	411,240	4.7	4.5	4.5	16.6	20.9	15.9	34.4	17.2	34.6	44.2	57.4	44.7	0.1	0.0	0.2
Santa Barbara MSA	110	286,085	1.1	9,667	0.0	0.9	0.4	9.9	10.0	11.9	11.3	0.9	11.0	78.8	88.2	76.7	0.0	0.0	0.0
Total	10,477	12,668,135	100.0	1,655,750	3.1	1.7	2.9	17.6	11.2	16.1	32.1	10.9	31.8	47.1	76.1	49.0	0.1	0.1	0.3

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Los Angeles CSA	8,515	10,717,414	81.3	1,018,980	23.9	1.7	3.1	16.5	3.0	8.5	17.6	4.6	17.8	42.0	75.2	51.8	0.0	15.5	18.8
San Diego MSA	723	702,715	6.9	215,863	23.6	2.8	3.1	16.9	5.0	9.4	17.8	8.0	18.4	41.7	74.8	49.9	0.0	9.4	19.2
San Francisco CSA	1,129	961,921	10.8	411,240	24.3	3.8	5.0	15.8	8.7	12.2	18.2	13.2	19.7	41.7	67.4	52.3	0.0	6.9	10.8
Santa Barbara MSA	110	286,085	1.1	9,667	17.3	1.8	2.1	13.8	3.6	4.4	16.8	3.6	11.5	52.1	68.2	66.6	0.0	22.7	15.4
Total	10,477	12,668,134	100.0	1,655,750	23.9	2.0	3.6	16.4	3.8	9.5	17.8	5.8	18.3	42.0	74.3	51.8	0.0	14.2	16.9

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	
Los Angeles CSA	20,068	3,144,742	88.3	765,991	4.8	2.6	4.6	20.2	11.4	20.6	26.9	17.5	27.6	46.6	65.6	46.0	1.5	2.9	1.2	
San Diego MSA	1,095	257,479	4.8	118,477	5.6	4.7	5.2	14.7	11.5	14.3	34.7	32.1	34.6	44.9	51.8	45.9	0.1	0.0	0.1	
San Francisco CSA	1,538	397,886	6.8	230,892	10.2	16.2	9.7	17.6	18.7	18.5	30.3	26.8	32.1	41.3	37.2	39.3	0.6	1.2	0.4	
Santa Barbara MSA	37	8,919	0.2	8,274	1.0	0.0	0.6	32.1	35.1	34.5	12.0	8.1	12.1	54.1	56.8	52.1	0.7	0.0	0.7	
Total	22,738	3,809,026	100.0	1,123,634	6.0	3.6	5.7	19.1	12.0	19.6	28.4	18.8	29.2	45.3	63.0	44.7	1.2	2.7	0.9	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Los Angeles CSA	20,068	3,144,742	88.3	765,991	90.3	20.0	45.5	3.8	32.5	6.0	47.5	
San Diego MSA	1,095	257,479	4.8	118,477	90.1	21.6	46.4	3.7	53.6	6.3	24.8	
San Francisco CSA	1,538	397,886	6.8	230,892	88.6	22.6	48.0	4.4	57.2	7.0	20.3	
Santa Barbara MSA	37	8,919	0.2	8,274	88.3	5.4	43.9	4.5	40.5	7.2	54.1	
Total	22,738	3,809,026	100.0	1,123,634	89.9	20.3	46.1	3.9	35.2	6.2	44.5	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
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	89	180,402	100.0	92,934	2.0	0.0	1.5	21.4	11.2	17.3	31.9	5.6	30.3	44.4	83.1	50.0	0.2	0.0	0.9
Total	89	180,402	100.0	92,934	2.0	0.0	1.5	21.4	11.2	17.3	31.9	5.6	30.3	44.4	83.1	50.0	0.2	0.0	0.9

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
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	89	180,401	100.0	92,934	24.0	2.2	1.1	16.6	0.0	5.1	16.9	2.2	15.7	42.6	77.5	58.4	0.0	18.0	19.7
Total	89	180,401	100.0	92,934	24.0	2.2	1.1	16.6	0.0	5.1	16.9	2.2	15.7	42.6	77.5	58.4	0.0	18.0	19.7

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	61	6,311	100.0	185,168	3.1	0.0	3.1	20.8	18.0	22.3	26.3	8.2	27.0	47.5	68.9	45.4	2.3	4.9	2.2	
Total	61	6,311	100.0	185,168	3.1	0.0	3.1	20.8	18.0	22.3	26.3	8.2	27.0	47.5	68.9	45.4	2.3	4.9	2.2	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	61	6,311	100.0	185,168	94.7	21.3	42.2	1.8	32.8	3.5	45.9	
Total	61	6,311	100.0	185,168	94.7	21.3	42.2	1.8	32.8	3.5	45.9	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
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	
Atlanta MSA	161	112,199	100.0	106,959	7.0	10.6	7.6	22.3	23.6	20.0	18.4	8.7	17.0	52.2	57.1	55.4	0.1	0.0	0.1	
Total	161	112,199	100.0	106,959	7.0	10.6	7.6	22.3	23.6	20.0	18.4	8.7	17.0	52.2	57.1	55.4	0.1	0.0	0.1	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21
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	
Atlanta MSA	161	112,199	100.0	106,959	25.1	1.2	4.7	15.2	11.2	12.7	15.3	9.9	16.5	44.3	63.4	48.0	0.0	14.3	18.2	
Total	161	112,199	100.0	106,959	25.1	1.2	4.7	15.2	11.2	12.7	15.3	9.9	16.5	44.3	63.4	48.0	0.0	14.3	18.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	
Atlanta MSA	220	41,309	100.0	90,652	10.0	9.1	9.0	22.4	13.2	21.5	15.9	11.4	15.7	50.7	66.4	53.0	1.0	0.0	0.8	
Total	220	41,309	100.0	90,652	10.0	9.1	9.0	22.4	13.2	21.5	15.9	11.4	15.7	50.7	66.4	53.0	1.0	0.0	0.8	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Atlanta MSA	220	41,309	100.0	90,652	92.7	27.3	40.6	2.3	35.9	5.0	36.8	
Total	220	41,309	100.0	90,652	92.7	27.3	40.6	2.3	35.9	5.0	36.8	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
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	
Minneapolis MSA	235	107,556	100.0	81,241	3.3	6.0	3.7	14.7	22.6	14.3	40.8	26.0	38.6	41.0	45.5	43.2	0.2	0.0	0.2	
Total	235	107,556	100.0	81,241	3.3	6.0	3.7	14.7	22.6	14.3	40.8	26.0	38.6	41.0	45.5	43.2	0.2	0.0	0.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21
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	
Minneapolis MSA	235	107,556	100.0	81,241	21.8	10.2	8.0	16.3	26.8	19.0	20.0	9.8	20.0	41.8	51.1	36.8	0.0	2.1	16.2	
Total	235	107,556	100.0	81,241	21.8	10.2	8.0	16.3	26.8	19.0	20.0	9.8	20.0	41.8	51.1	36.8	0.0	2.1	16.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
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
Minneapolis MSA	46	9,078	100.0	38,931	7.2	2.2	7.6	15.5	2.2	15.7	38.9	30.4	37.6	37.7	65.2	38.7	0.6	0.0	0.4
Total	46	9,078	100.0	38,931	7.2	2.2	7.6	15.5	2.2	15.7	38.9	30.4	37.6	37.7	65.2	38.7	0.6	0.0	0.4

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Minneapolis MSA	46	9,078	100.0	38,931	87.5	34.8	48.9	4.9	41.3	7.6	23.9	
Total	46	9,078	100.0	38,931	87.5	34.8	48.9	4.9	41.3	7.6	23.9	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2019-21**

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
Las Vegas MSA	480	256,689	67.5	155,149	1.9	0.8	1.3	16.9	19.6	12.0	41.7	28.1	42.8	39.5	51.0	43.9	0.0	0.4	0.0
Reno CSA	231	113,355	32.5	43,957	2.1	0.9	1.9	13.0	9.1	10.4	43.2	24.7	43.8	41.5	64.9	43.7	0.3	0.4	0.3
Total	711	370,043	100.0	199,106	2.0	0.8	1.4	15.9	16.2	11.7	42.1	27.0	43.1	40.0	55.6	43.8	0.1	0.4	0.1

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2019-21**

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
Las Vegas MSA	480	256,689	67.5	155,149	20.7	6.7	5.0	18.4	29.2	14.3	20.5	9.8	20.5	40.5	49.4	37.7	0.0	5.0	22.6
Reno CSA	231	113,355	32.5	43,957	20.8	4.8	5.0	17.2	12.6	16.1	20.7	6.5	22.6	41.3	70.6	40.3	0.0	5.6	16.0
Total	711	370,043	100.0	199,106	20.7	6.0	5.0	18.1	23.8	14.7	20.6	8.7	20.9	40.6	56.3	38.3	0.0	5.2	21.1

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
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
Las Vegas MSA	898	153,464	68.2	73,338	3.8	3.7	3.0	20.8	19.2	18.4	38.7	39.1	38.8	36.1	36.2	39.4	0.6	1.9	0.4
Reno CSA	419	66,292	31.8	17,233	6.9	4.8	7.2	22.2	20.8	19.7	29.3	24.8	30.0	37.5	44.9	39.9	4.1	4.8	3.3
Total	1,317	219,756	100.0	90,571	4.5	4.0	3.8	21.1	19.7	18.6	36.6	34.5	37.1	36.4	39.0	39.5	1.4	2.8	0.9

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Las Vegas MSA	898	153,464	68.2	73,338	86.8	19.6	43.6	4.3	35.0	8.9	45.4	
Reno CSA	419	66,292	31.8	17,233	82.5	32.9	50.3	5.9	40.6	11.6	26.5	
Total	1,317	219,756	100.0	90,571	85.9	23.8	44.8	4.7	36.8	9.5	39.4	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
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	
New York MSA	848	1,572,946	100.0	186,700	2.3	0.9	2.8	15.8	5.3	15.9	47.3	19.8	47.7	34.3	73.8	33.4	0.2	0.1	0.2	
Total	848	1,572,946	100.0	186,700	2.3	0.9	2.8	15.8	5.3	15.9	47.3	19.8	47.7	34.3	73.8	33.4	0.2	0.1	0.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21
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	
New York MSA	848	1,572,946	100.0	186,700	27.2	1.8	3.5	16.1	1.3	15.1	17.8	2.5	22.2	38.8	74.9	47.0	0.0	19.6	12.2	
Total	848	1,572,946	100.0	186,700	27.2	1.8	3.5	16.1	1.3	15.1	17.8	2.5	22.2	38.8	74.9	47.0	0.0	19.6	12.2	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	
New York MSA	2,728	385,320	100.0	353,031	5.9	1.1	5.9	17.7	3.2	17.6	30.4	6.6	31.6	43.8	78.9	42.6	2.2	10.2	2.2	
Total	2,728	385,320	100.0	353,031	5.9	1.1	5.9	17.7	3.2	17.6	30.4	6.6	31.6	43.8	78.9	42.6	2.2	10.2	2.2	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
New York MSA	2,728	385,320	100.0	353,031	90.6	18.5	36.3	3.9	26.7	5.5	54.8	
Total	2,728	385,320	100.0	353,031	90.6	18.5	36.3	3.9	26.7	5.5	54.8	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21
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
Nashville MSA	383	249,293	100.0	47,137	7.7	17.0	11.3	21.0	20.9	20.0	38.0	16.4	36.5	33.3	45.7	32.2	0.0	0.0	0.0
Total	383	249,293	100.0	47,137	7.7	17.0	11.3	21.0	20.9	20.0	38.0	16.4	36.5	33.3	45.7	32.2	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21
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
Nashville MSA	383	249,293	100.0	47,137	26.1	4.4	5.4	17.9	7.8	16.8	19.2	12.0	19.2	36.7	53.8	41.1	0.0	21.9	17.5
Total	383	249,293	100.0	47,137	26.1	4.4	5.4	17.9	7.8	16.8	19.2	12.0	19.2	36.7	53.8	41.1	0.0	21.9	17.5

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
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	
Nashville MSA	779	80,908	100.0	25,661	12.6	39.0	13.6	22.8	5.4	24.2	25.3	4.6	25.0	37.7	46.1	35.5	1.6	4.9	1.6	
Total	779	80,908	100.0	25,661	12.6	39.0	13.6	22.8	5.4	24.2	25.3	4.6	25.0	37.7	46.1	35.5	1.6	4.9	1.6	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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	
Nashville MSA	779	80,908	100.0	25,661	87.5	30.0	46.8	4.0	17.7	8.5	52.2	
Total	779	80,908	100.0	25,661	87.5	30.0	46.8	4.0	17.7	8.5	52.2	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*