



LIMITED PURPOSE

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

March 31, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citibank (Nevada), National Association
Charter Number: 20484

8725 West Sahara Avenue
Las Vegas, Nevada 89117

Comptroller of the Currency
Large Bank Division
250 E Street, SW
Washington, D.C. 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, nor should it 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.

Institution's CRA rating:

This institution is rated Outstanding.

The conclusions for the three rating criteria are:

- The bank demonstrates a high level of qualified investments and community development loans and services, particularly services that are not routinely provided by other financial institutions.
- The bank demonstrates extensive use of innovative community development services.
- The bank demonstrates excellent responsiveness to credit and community development needs in its assessment area (AA).

Scope of the Examination

In evaluating the bank's performance under the CRA, we reviewed community development activities from **March 30, 1999** through **March 31, 2003**. We reviewed the level and nature of qualified investments, community development lending, and community development services. At the bank's request, we also considered qualified investments and community development lending provided by its affiliates. At the prior examination dated **March 29, 1999**, we rated the bank "Outstanding."

At the bank's request, we considered community development investments and a community development loan that benefit an area outside of its AA in the evaluation of the bank's performance. Citibank has adequately addressed the needs of its AA, and therefore, the community development investments and loan were considered in evaluating its performance.

Description of Institution

Citibank (Nevada), National Association (Citibank) is a \$7.1 billion bank located in Las Vegas, Nevada. The bank has no branches. Citibank was originally chartered in 1985 as a retail banking operation. The operation later expanded to four financial centers, a community lending center and a credit card processing facility. However, since the last examination, the bank's parent company has acquired and merged several financial institutions. After the merger with Golden State Bancorp was completed, most of Citibank's retail banking facilities were absorbed by Citibank (West), FSB. Citibank retained the credit card processing facility, and in November 2002 obtained a limited purpose designation. Consequently, Citibank does not offer many of the standard retail products such as deposit accounts, commercial or consumer loans (other than credit cards), safety deposit box rental, or an ATM network. The majority of the bank's funding is derived from the securitization of receivables, which are securitized into the Citibank Credit Card Master Trust.

Citibank is a subsidiary of Citicorp, which is headquartered in New York, New York. As of

December 31, 2002, Citicorp's total assets were \$727 billion. Citibank is one of several banking subsidiaries of Citicorp. The other banking subsidiaries are Citibank, N.A.; Citibank (New York State); Citibank (Delaware); Citibank, Federal Savings Bank; Citicorp Trust Bank, FSB; Universal Financial Corporation; Citibank (West) FSB; Citibank (USA) National Association; CitiMortgage, Inc., CitiFinancial Mortgage Company Inc., and Associates Capital Bank, Inc. Citicorp is a subsidiary of Citigroup, which is the largest financial services company in the world. In addition, to its banking services, it offers insurance, securities brokerage, and investment banking products.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA. The following table provides financial information for Citibank.

Table 1: Financial Information (000s)

	Year-end 1999	Year-end 2000	Year-end 2001	Year-end 2002	Average for Evaluation Period
Tier 1 Capital	* 870,894	* 940,534	* 1,263,593	* 2,007,699	1,270,680
Total Income	* 2,070,413	* 2,398,105	* 2,239,579	* 2,135,719	2,210,954
Net Operating Income	* 761,701	* 837,715	* 1,535,438	* 743,443	969,602
Total Assets	* 7,119,133	*11,077,725	* 7,602,583	* 9,756,663	8,889,026
Pass-Through Receivables	*27,917,442	*31,963,056	*30,840,625	*30,759,556	30,370,170

Source: Consolidated Report of Condition and Income and bank reported data.

* Actual data reported. The Average for Evaluation Period is the average of the numbers in the four columns.

Description of Assessment Area

Citibank operates in an urban area. The bank has designated Clark County as its AA. The AA consists of 345 census tracts in the Las Vegas MSA, and includes the cities of Las Vegas, North Las Vegas, Boulder City, Henderson, Laughlin, and Mesquite. The AA meets the legal requirements of the CRA. The table below shows specific demographic data for Clark County.

Table 2: Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tracts	345	1%	19%	40%	38%
Families	342,405	17%*	18%*	23%*	42%*
Businesses	99,064	3%**	14%**	37%**	46%**

Source: Demographic Data - 2000 U.S. Census, Dun & Bradstreet Data. *Represents families by income level.

**Represents businesses by income level of census tract.

Las Vegas is a major gaming, convention, and resort destination for domestic and foreign visitors. Major employers include hotels, gaming, and service-related industries. Government, retail trades, mining, manufacturing, and agriculture are among the most significant employers. However, the Las Vegas MSA and the entire state of Nevada are still dominated completely by the gaming and tourist industry.

The AA has experienced phenomenal growth over the past decade. The Las Vegas-based

Metropolitan Research Organization estimates that over 5000 people move to Southern Nevada each month. Demographic data indicates the population of Clark County nearly doubled and the number of census tracts nearly tripled over the past decade. Significant growth occurred in the number of moderate-, middle-, and upper-income census tracts. The Las Vegas 2002 Master Plan, which was developed by the City of Las Vegas, notes that growth has largely taken place in outlying areas primarily in the form of isolated, gated communities. Downtown areas have experienced deterioration, disinvestment, and higher vacancy rates.

The 2002 HUD estimated median family income in Las Vegas was \$54,700. The unemployment rate in Las Vegas as of January 2003 was at 5.6%. This is slightly below the national average of 5.7% for the same time period. Despite the fact that the region has managed to avoid the degree of economic hardship faced elsewhere, some residents have suffered unemployment or reduction in income.

New businesses continue to move to the AA in record numbers. The favorable tax structure, abundant labor force, close proximity to major western markets, and overall lifestyle that the area offers all contribute to the attraction of new businesses. The AA has just over 99,000 small businesses; more than half of those have revenues of less than \$1 million. The businesses are primarily retail and service businesses with specialized financial needs.

Las Vegas has several community-based organizations with a community development purpose, particularly for small business development and affordable housing. Generally, these organizations have limited expertise in community development activities. The area has a critical shortage of affordable housing units; and the local government does not sponsor substantial community development programs to further encourage housing development. The rapid influx of people has aggravated the problem. Housing prices and rents have increased faster than income levels. Although there are numerous jobs, most of these jobs are unskilled labor jobs in the service or retail sectors and offer lower pay, often without benefits. The city has a large volume of substandard housing. Estimates are that there are 17 thousand substandard rental units in Las Vegas. The large transient population has created a significant need for affordable rental units. The median home price has increased to more than \$180,000, which makes it difficult for LMI individuals who desire to own a home to meet the guidelines for home ownership. A large population of homeless people, many with chemical dependency, also puts pressure on city housing resources. This all presents a challenge to community development organizations that work to provide affordable housing and increase homeownership among LMI populations.

During this examination we interviewed representatives of four community development organizations and reviewed fourteen community contacts made by the OCC and other regulatory agencies during the last three years. These contacts include representatives from local government, economic development organizations, organizations that focus on affordable housing issues, and organizations that provide needed social services to LMI people. They indicated there is a significant need for affordable housing units for LMI people, which are near transportation and jobs. They also indicated there is a need for financial institutions to provide funding for programs that benefit LMI people, specifically programs that provide job training for skilled occupations. And there is a need to provide capital to start a business or to buy business

real estate.

There are a number of competing institutions in the AA. However, most of these institutions do not compare to Citibank in business focus. There are only two other financial institutions in the AA, which focus primarily on credit card lending. There are a number of opportunities for financial institutions to provide community development services, loans, and grants, with significantly fewer opportunities for community development investments.

Conclusions About Performance

Summary

Citibank has done an excellent job serving its AA's community development needs through numerous investments, services, and loans. During the review period, Citibank invested almost \$65 million and provided loans amounting to \$211 million in projects and activities that benefit the bank's AA. Citibank employees have provided a substantial number of services to numerous community development organizations. Further, Citibank implemented an innovative initiative to develop the expertise and increase the resources of many community development organizations. Citibank has an effective ongoing process to determine the needs of its AA and actively addresses those needs creatively and proactively using its management team's skills and expertise.

The overall level of qualified community development investments, services, and loans is excellent. The bank has a high dollar volume of community development loans and investments, and provided a significant number of services, including numerous innovative services, in an effort to meet the community development needs of its AA.

Citibank demonstrated creativity and initiative by helping to meet the numerous and varied needs of its AA. The bank demonstrated originality when it developed strategic partnerships with community development organizations. Through these partnerships, Citibank strives not only to provide financial support, but also to provide services and other types of non-monetary support in an effort to strengthen the entire organization. The bank also demonstrated originality - in sponsoring workshops - which have helped build stronger, well-managed community development organizations. Further, Citibank has provided local community development organizations with grants to hire college interns for special projects, which in turn benefit LMI individuals.

The bank has demonstrated excellent responsiveness to community development needs in its AA. Citibank has responded to the need to provide affordable housing through its investments and loans in affordable housing initiatives and projects. A review of the projects indicates the bank has sponsored and supported a number of high quality, well-managed housing projects. Citibank also responded to a need to assist individuals who are on welfare or who hold unskilled, low-paying jobs to advance to higher paying jobs, by sponsoring a local program that provides job training for unskilled individuals and eventually places them in jobs that allow them to become self-supporting. In addition, the bank responded to a need to develop the expertise of community development organizations in the AA.

Qualified Investments

During the review period, Citibank provided over \$68 million in qualified investments, grants, and donations to community development organizations. Nearly \$65 million of the investments benefited the AA and a greater regional area.

Table 3: Qualified Investment Activity (000s)

	Benefits AA	Outside AA	Totals
Originated Investments	38,589	3,339	41,928
Originated Grants	10,418	110	10,528
Prior-Period Investments that Remain Outstanding	15,765	0	15,765
Total Qualified Investments	64,772	3,449	68,221
Unfunded Commitments*	4,794	20,302	25,096

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

Table 4: Qualified Investment Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total Investments/Average Tier 1 Capital	5.1%	0.3%	5.4%
Total Investments/Average Total Income	3.0%	0.1%	3.1%
Total Investments/Average Pass-Through Receivables	0.2%	0.0%	0.2%

Citibank's most notable qualified investments, grants, and donations in the AA consist of the following:

- \$24 million represents targeted security investments and low-income housing tax credits, which support underlying mortgages to low- and moderate-income families. A majority of the mortgages are in the bank's AA.
- \$4.7 million provided funds for an affordable 224-unit apartment complex. The complex houses LMI families; with 22 units designated for LMI senior citizens. Currently, there are no non-profit community development intermediaries with a full-time operation in Nevada. By directing this national partner to focus on the state, Citibank ensured that much-needed capital reached an underserved market in its AA.
- \$5.7 million provided funds for an affordable 195-unit apartment complex for LMI families whose income is at or below 60% of the area median income (AMI).
- \$1.3 million was invested in an equity fund, which provided an investment in inner city

commercial real estate in the bank's AA. The commercial and professional facilities must be located in Empowerment Zones, Enterprise Communities, and other inner city locations. Through this investment Citibank is providing equity funding to help create self-sustaining long-term economic development in areas of pervasive poverty and high unemployment.

- \$10 million consists of fair share contributions to Consumer Credit Counseling Services (CCCS) organizations, which benefit the bank's AA and a greater regional area.
- \$97 thousand represents grants and sponsorships to an organization that was created to provide flexible financing to small- and medium-size businesses that provide job creation for low- and moderate-income individuals and help diversify Nevada's economy. These businesses do not qualify for conventional financing.
- \$45 thousand represents grants and sponsorships to a community development organization that assists under-employed and unemployed individuals to get off welfare, receive vocational training and job placement, and move toward self-sufficiency through earning higher wages. More than 80% of the organization's clients have incomes of less than \$8,000 and over 80% of the clients are single mothers.
- \$44 thousand represents grants and sponsorships to an organization dedicated to providing safe, decent, energy-efficient housing that is affordable to LMI families. The organization builds, rehabilitates, and operates housing through a combination of public and private financing sources. Citibank has provided support to this organization since its inception and is its largest corporate financial supporter. The bank has provided funds for computer equipment, sponsored staff training, and offered financial education seminars at the organization's affordable housing developments. One of the bank's grants provided support for an after school latchkey program at one of the organization's affordable housing developments.

In addition, Citibank was the only institution in Las Vegas to provide funding for a specific project that helped revitalize and stabilize a low-income geography that has been designated for redevelopment under a local plan.

Consideration of Activities that Benefit Areas Outside the Bank's Assessment Area

Citibank has adequately addressed the needs of its AA; therefore, we considered activities outside the AA. During the review period, Citibank provided \$3.4 million in qualified investments and grants that benefited areas outside the bank's AA. The funds were used to provide homebuyer education for LMI individuals, affordable housing for low- and very low-income families, and an assisted living facility for low-income senior citizens.

Community Development Lending

During the evaluation period, Citibank provided qualified community development loans totaling \$211 million in its AA. The bank provided almost \$5 million in community development loans outside its AA. Table 5 shows the financial contributions in relation to

Citibank’s financial information.

Table 5: Community Development Lending Percentages

	Benefits AA (%)	Outside AA (%)	Total (%)
Total CD Lending/Average Tier 1 Capital	16.60%	.40%	17.00%
Total CD Lending/Average Total Income	9.54%	.23%	9.77%
Total CD Lending/ Average Pass-Through Receivables	.69%	.02%	.71%

Citibank provided project and working capital loans to non-profit community development organizations and developers of affordable housing, and below market rate loans to community development intermediary organizations that provide financial and technical services to community-based organizations. In addition, prior to its conversion to a limited purpose bank, Citibank and its affiliates provided affordable housing loans to LMI families (these loans are captured under CD Lending), a loan for revitalization of LMI areas, and loans to affordable housing providers. The following is a sample of the community development loans that benefit the bank’s AA.

- \$184.7 million provided affordable home mortgage loans for LMI families.
- \$14.7 million provided funds to develop affordable housing for LMI families.
- \$4.9 million provided funds to refinance a property, which includes a 144-unit apartment complex occupied by households earning between 40% and 60% of the area median income. In addition to the units, there is a women’s shelter on site.
- \$3.2 million provided funds to a local housing authority, which was formed to address the shortage of affordable, safe, and sanitary living units for low-income individuals and families. Much of the organization’s activity has centered on contracts with the Department of Housing and Urban Development to provide Section 8 housing. The bank provided funds to purchase and rehabilitate three multi-family complexes. In total, these complexes provide 121 affordable housing units.
- \$1.2 million provided funds to a partnership to construct a 72-unit apartment complex for low-income senior citizens. Local health care providers offer monthly health screening and testing at no cost to tenants.
- \$875 thousand provided funds to a community development corporation focused on conducting and supporting activities that reverse community deterioration and improve the quality of life of residents in East Las Vegas. The bank’s loan aided in the completion of 40 affordable single-family housing units.

- \$875 thousand provided funds to revitalize LMI areas.
- \$538 thousand provided funds to a local community development organization, which supports affordable housing. The loan financed a 16-unit affordable housing complex in a transitional neighborhood located within the City of Las Vegas Redevelopment District.

Consideration of Activities that Benefit Areas Outside the Bank’s Assessment Area

Citibank has adequately addressed the needs of its AA; therefore, we considered activities outside the AA. During the review period, Citibank provided \$5 million to a limited partnership to refinance a loan. The loan will allow the partnership to save over \$60 thousand annually for the next 30 years and will help ensure the continued availability of quality affordable housing for residents in Reno, Nevada. The proceeds refinanced a 142-unit multi-family housing complex for LMI individuals and families.

Community Development Services

During the review period, Citibank provided a number of exemplary community development services. Not only did the bank provide numerous hours of qualified services to various community development organizations, but also played a leadership role in offering innovative services through its Community Development Institute. Through sponsorship of technical assistance and training services, the institute seeks to develop program management and financial skills of non-profit community development organizations. The initiatives are very responsive to a recognized need in the AA, which indicates that many community development organizations lack the expertise and resources needed to successfully operate a non-profit organization. The bank has formed strong relationships with key strategic partners and has provided a combination of grants and services, thereby enhancing the success of the organizations. Some of the services noted in this section were funded by grants noted in the **Qualified Investments** section of this report. In addition to the grants, which supported the services, Citibank employees expended significant time and effort to provide the services noted below, including administrative services and technical expertise. The following illustrates the bank’s efforts to meet the community development needs in its AA.

CD Capacity Building Program

- In order to build stronger community development organizations, Citibank sponsored four National Development Council (NDC) training programs during the past four years. In conjunction with this, bank personnel also provided administrative services. NDC is recognized leader in community development training. If Citibank had not taken the initiative to sponsor the training programs, NDC would not have otherwise provided these courses locally.
- The bank hosted and provided administrative and technical services at a three-day training program entitled “Single Family Home Ownership Finance.” Twenty-eight individuals from non-profit, real estate development, and government backgrounds attended. Participants were primarily from community development organizations.
- Citibank hosted and provided administrative and technical services at a three-day training program in 1999 entitled “Low Income Housing Tax Credits.” Fifteen individuals from community development organizations attended.
- In 2000, Citibank hosted a course called “Development Finance for Child Care Facilities.” In conjunction with this, bank personnel provided administrative and technical services. Fifteen LMI child care providers attended.

In addition to the above, the bank’s employees have served more than twenty different community development organizations in the AA. Citibank’s employees have used their management and financial expertise by serving on the boards and committees of fifteen different community development organizations. Below are some examples:

Table 7: Community Development Service Activities

CD Service	Benefits AA	Outside AA
A Citibank representative is an active member of the Clark County Affordable Housing Committee. The purpose of the committee is to submit recommendations to the Board of County Commissioners to increase the supply of affordable housing units in the county.	X	
The bank is a founding member of an organization that was developed to encourage and assist the development of affordable housing in Southern Nevada. Currently, the bank has assumed a leadership role and provides technical expertise to the center. The organization consists of support teams to assist non-profit organizations in bringing specific projects to successful implementation.	X	

<p>Numerous bank employees partnered with Junior Achievement to teach basic personal economic issues, examine the role of families in the local economy, conduct mock business operations, and learn about world economic systems. Citibank staff members have also participated in a mentoring initiative called “Success Now,” under which volunteers meet with a classroom once a week for the entire school year. The program focuses on the fundamentals of owning a business and encourages children to develop and sell an actual product. In 2002, 49 Citibank employees taught 1,470 students. In 2001, 36 employees taught 1,080 students. In 2000, 45 employees taught 1,350 students. All volunteer efforts have been targeted to schools with primarily LMI students and those located in LMI neighborhoods.</p>	<p>X</p>	
<p>A senior officer of Citibank serves on the board of directors of a local foundation, which focuses on providing vocational training and education for low-wage, unskilled individuals. Citibank staff has assisted the foundation as a strategic partner for a number of years. The bank has been instrumental in the success of this CD organization because of its ability to lead the founders and the board toward a broad-based and well-managed business approach.</p>	<p>X</p>	
<p>Citibank employees participated on the advisory board of a CD organization that focuses on economic development and providing affordable housing. An employee of the bank also taught homebuyer education classes in both English and Spanish to LMI individuals.</p>	<p>X</p>	
<p>A Citibank employee is an active member of a local task force whose focus is to assess and review the organizational structure currently in place to address housing for LMI disabled individuals.</p>	<p>X</p>	
<p>Citibank has provided first time homebuyer seminars in conjunction with a CD organization that focuses on providing assistance to LMI first time homebuyers and LMI senior citizens.</p>	<p>X</p>	
<p>Through continued board involvement and management expertise, Citibank has enhanced the capacity of a local CD organization to develop innovative programs that meet the needs of LMI Native Americans.</p>	<p>X</p>	

<p>Citibank has been a strong supporter and advisor of the Local Initiatives Support Corporation (LISC). This included connecting LISC to community resources as there is no clearly defined ‘inner city’ toward which LISC could direct its affordable housing programs. The bank provided an extensive three-day course entitled, “Affordable Multi Family Finance” for the LISC staff and members of local CDCs. (This intermediary no longer maintains an office in Las Vegas.)</p>	<p>X</p>	
<p>The bank president and the CRA officer offered their managerial and financial expertise by participating as a member of the board and as a member of the loan review committee for a local development capital corporation. The corporation was created to provide flexible financing to small- and medium-size businesses that provide job creation for LMI individuals and help diversify Nevada’s economy, but do not qualify for conventional financing.</p>	<p>X</p>	
<p>Citibank took a leadership role with an organization that creates and supports community revitalization by providing quality affordable housing opportunities with an emphasis on family homeownership through education, counseling, and housing related services. Management assisted by providing commitment letters to be included in all government funding applications in Clark County. A representative of Citibank is a board member and is actively involved in homebuyer education seminars for LMI individuals.</p>	<p>X</p>	

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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 both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Assessment Area (AA) – A geographic area that consists generally of one or more MAs (using the MA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

Benefit to Assessment Area – A qualified Community Development activity benefits the AA if (i) the activity benefits areas within the AA, or (ii) the activity benefits a broader statewide or regional area that includes the bank’s AA. If a bank has adequately addressed the needs of its AA, then the OCC also considers activities submitted by the bank that benefit areas outside of its AA.

Block Numbering Area (BNA) – Statistical subdivisions of counties in which census tracts have not been established. The United States Census Bureau has established BNAs in conjunction with state agencies.

Census Tract (CT) – Small, locally defined statistical areas within Metropolitan Areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

Community Development (CD) – Affordable 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 the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA) – The statute that requires the OCC to evaluate a bank’s record of meeting the credit needs of its local community, 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.

Geography – A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Limited Purpose Institution – An institution that offers only a narrow product line (such as credit cards or automobile loans) to a regional or broader market and for which a designation as limited purpose bank is in effect.

Median Family Income (MFI) – The median income determined by the United States Census Bureau every 10 years and used to determine the income level category of geographies. Also, it is the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of families. For any given geography, the median is the point at which half of the families have income above it and half below it. (See the four categories of median income below.)

- **Low-Income** – An income level that is less than 50% of the MFI.
- **Moderate-Income** – An income level that is at least 50% and less than 80% of the MFI.
- **Middle-Income** – An income level that is at least 80% and less than 120% of the MFI.
- **Upper-Income** – An income level that is 120% or more of the MFI.

Metropolitan Area (MA) – Area defined by the director of the United States Office of Management and Budget. MAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Net Operating Income – As listed in the Consolidated Report of Condition and Income: Income before income taxes and extraordinary items and other adjustments.

Pass-Through Receivables – Outstanding receivables tied to all accounts issued or owned by the bank. Pass-through receivables include receivables attributable and receivables retained on balance sheet as those terms are used in 12 CFR 8.

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

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

Total Assets – Total bank assets as listed in the Consolidated Report of Condition and Income.

Total Income – From the Consolidated Report of Condition and Income – Total Interest income plus Total Noninterest income.