

**STRATEGIC PLAN** 

### PUBLIC DISCLOSURE

September 25, 2017

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Department Stores National Bank

701 East 60th Street North Sioux Falls, SD 57104 Charter Number 24622

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, 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.

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**OVERALL CRA RATING:** This institution is rated **Outstanding**. The rating is based on the following factors:

- An excellent level of qualified community development (CD) investments. The bank exceeded the investment goals for outstanding performance set forth in its CRA Strategic Plans for the 2014 to 2016 CRA evaluation period. Nearly \$18 million in CD investments and grants were made during this period. The majority of the investments helped to create affordable housing to the assessment area and broader regional area.
- An excellent level of CD services. The bank achieved the service goals for outstanding performance set forth in its CRA Strategic Plans for the 2014 to 2016 CRA evaluation period. The bank works effectively with community groups that support services targeting affordable housing, financial education, and social services for low- and moderate-income (LMI) individuals and services for small businesses.

### **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population haracteristics, economic status, and living conditions to allow for statistical comparisons.

**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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s).

**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.

**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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

### **Description of Institution**

Department Stores National Bank (DSNB) is an intrastate bank headquartered in Sioux Falls, South Dakota. DSNB was established as the credit card issuer for Visa and retail private label accounts for Citigroup's relationship with Macy's, Inc. Credit cards issued by DSNB bear the marks of Macy's, Inc. store brands including Bloomingdale's and Macy's. DSNB does not have any employees or branch banking offices. Affiliates and third parties, pursuant to contracts, currently provide all servicing of DSNB's accounts. CRA activities are allocated to DSNB from affiliates, primarily from Citibank, N.A. (CBNA) and its subsidiary CitiHousing, Inc., Citi Community Capital (CCC), and the Citi Foundation. For the purpose of the CRA, DSNB is designated a limited purpose bank. OCC rated DSNB Satisfactory at its last CRA evaluation dated December 31, 2013.

DSNB, chartered in 2005 under the Competitive Equality Banking Act (CEBA) of 1987, is not a "bank" for purposes of the Bank Holding Company Act. A CEBA bank engages only in credit card operations and does not accept demand deposits or savings or time deposits of less than \$100,000 (other than to secure extensions of credit). DSNB receives intercompany funding and has no external deposits or other borrowings. Other than the restriction on lending, there are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment area (AA).

DSNB is a wholly-owned subsidiary of CBNA. CBNA is headquartered in Sioux Falls, South Dakota and is a wholly-owned subsidiary of Citigroup Inc. (Citi). Citi is a leading global financial services company with nearly 200 million customer accounts that does business in more than 160 countries and jurisdictions. Citi provides consumers, corporations, governments, and institutions with a broad range of financial products and services, including consumer banking and credit, corporate and investment banking, securities brokerage, transaction services, and wealth management amenities. As of December 31, 2016, Citi reported assets of approximately \$1.7 trillion.

Financial Information (\$000s)	Year-end 2014	Year-end 2015	Year-end 2016
Tier 1 Capital	\$68,560	\$59,163	\$59,457
Total Interest/Operating Income	\$14,569	\$14,460	\$15,072
Net Operating/Net Income	\$5,080	\$5,351	\$4,130
Total Assets	\$411,696	\$367,568	\$352,178
Average Assets – as defined for the CRA	\$378,487	\$448,081	\$393,966

#### Table 1: DSNB Financial Information

Source: FFIEC Consolidated Reports of Condition

DSNB's AA consists of the Sioux Falls, South Dakota Metropolitan Statistical Area (MSA), which consists of four contiguous counties in the southeast corner of the state (Lincoln, McCook, Minnehaha, and Turner). The MSA has a combined population of 228,261 and is approximately 28 percent of the state's total population. Sioux Falls, the state's largest city, is located in Minnehaha and Lincoln Counties. There are no low-income census tracts due to the city's ability to integrate neighborhoods so that they span all income levels and do not limit economic isolation of the city's poorer residents. There are fourteen moderate-income census tracts.

McCook and Turner counties are very rural and were added to the MSA after the 2000 Census, which determined that 25 percent of the residents in these counties commute to Sioux Falls for work. With a combined population of about 14,000, McCook and Turner counties represent only six percent of the AA's population. Brandon, a city five miles east of Sioux Falls with a population estimate of 9,923, is the second largest city in the MSA.

Historically, the AA was centered in agriculture, but is now more economically diverse with major employers from the financial/insurance, healthcare, and retail services sectors. Businesses are drawn here due to the favorable tax climate and available workforce. Unemployment remains low at 2.5 percent, well below the national average of 4.7 percent and slightly below the state rate of 2.9 percent.

Assessment Area: Sioux Falls, South Dakota MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.0	24.6	54.4	21.1	0.0
Population by Geography	228,261	0.0	24.5	53.9	21.6	0.0
Housing Units by Geography	92,905	0.0	27.2	53.2	19.5	0.0
Owner-Occupied Units by Geography	59,610	0.0	18.0	58.2	23.9	0.0
Occupied Rental Units by Geography	27,208	0.0	45.1	42.8	12.1	0.0
Vacant Units by Geography	6,087	0.0	38.6	51.2	10.2	0.0
Businesses by Geography	16,692	0.0	34.5	46.2	19.3	0.0
Farms by Geography	1,431	0.0	6.2	78.7	15.1	0.0
Family Distribution by Income Level	58,142	18.0	18.2	26.2	37.6	0.0
Household Distribution by Income Level	86,818	21.4	17.8	20.2	40.5	0.0
2016 Median Family Income MSA - 43620 Sioux Falls, SD MSA		\$66,496	Median Housir	ng Value		\$146,371
			Median Gross	Rent		\$666
			Families Belov Unemploymen			5.9% 2.5%

Table 2 – Demographic	Information of the Assessment Area

Due to rounding, totals may not equal 100.0 (\*) The NA category consists of geographies that have not been assigned an income classification.

The Sioux Falls MSA is a very challenging market for community development. Although affordable housing is an issue in this area, subsidies are limited. The majority of funds from federal programs are allocated on a per capita basis. With its sparse population, South Dakota qualifies for only the minimum allocation. Another challenge is that many local nonprofits do not have the resources to undertake large community development efforts on their own. Lastly, this is a very competitive market. As of the June 30, 2016 FDIC Summary of Deposits, there were 36 depository institutions in this AA with 143 banking offices.

### Scope of the Evaluation

### **Evaluation Period/Products Evaluated**

The evaluation period of the bank's CRA performance is January 1, 2014 through December 31, 2016. During this period, the bank operated under two regulatory approved CRA Strategic Plans that covered different segments of the evaluation period. The 2013-2015 CRA Strategic Plan covers the 2014 and 2015 calendar year segments while the 2016-2020 CRA Strategic Plan covers the 2016 calendar year segment. Each Plan provided measurable goals to achieve satisfactory and outstanding ratings for DSNB's CD investments and services. CRA activities are allocated to DSNB from affiliates, primarily from CBNA and its subsidiaries CitiHousing, CCC, and the Citi Foundation. The OCC also considered the bank's adherence to laws and regulations prohibiting discrimination on a prohibited basis or other illegal credit practices.

### Selection of Areas for Full-Scope Review

The bank's single assessment area consisting of the Sioux Falls, SD MSA in its entirety received a full-scope review.

#### Ratings

The bank's overall rating is based on the area that received a full-scope review.

### **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC considered discriminatory or other illegal credit practices in rating the bank's performance. The OCC identified the following public information regarding noncompliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

• Noncompliance with laws prohibiting DSNB from engaging in Unfair Acts or Practices in violation of the Consumer Financial Protection Act of 2010 (12 USC 5531 and 12 USC 5536). Attorneys representing the bank modified previously executed sworn statements filed in debt collection cases in New Jersey state courts. The practice, affecting approximately 7,000 customers of both DSNB and its affiliate, CBNA, was identified by the bank in May 2011. The bank reported its findings to the New Jersey Administrative Office of the Courts and the OCC in November 2011, and subsequently to the CFPB. The New Jersey Superior Court approved the settlement offer provided by the bank in June 2014. The settlement provided for the bank to return \$11 million in payments from customers who made payments after the filing of the modified court documents, dismiss 6,738 pending collection lawsuits, and forgive approximately \$34 million in unsecured debt. DSNB consented to the issuance of a Consent Order by the CFPB on February 23, 2016. The Order requires the bank to comply with the bank's settlement with the New Jersey Superior Court and periodic submission of compliance plans to enhance oversight and compliance management systems.

The CRA performance rating was not lowered as a result of these findings. In determining the effect of these findings, we considered the nature, extent, and strength of the evidence of the practices. We considered the extent to which the bank had policies and procedures in place to prevent the practices. We also considered the extent to which the bank has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment, and other relevant information.

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

### Metropolitan Area

### Metropolitan Area of Sioux Falls, South Dakota

# CONCLUSIONS WITH RESPECT TO PERFORMANCE IN SIOUX FALLS, SOUTH DAKOTA

Performance is excellent as DSNB exceeded the 2014, 2015, and 2016 CD investment goals set for outstanding performance. During the evaluation period, total CRA qualified investments were approximately \$18 million. Investments in affordable housing projects qualifying for low-income housing tax credits (LIHTCs) were the largest portion of the investment total. Grants, totaling nearly \$1 million, focused on affordable housing, financial education, and economic development. Table 3 provides total CRA qualified investments and grant totals by year.

Strategic Plan Year	CCC / Citi Housing Investments \$(000s)	Citi Foundations Grants \$(000s)	Total Investments \$(000s)
2014	5,000	340	5,340
2015	5,000	306	5,306
2016	6,954	350	7,304
Total	16,954	996	17,950

#### Table 3: Total Qualified Investments

For the 2014 and 2015 Plan years, the annual goal for achieving satisfactory performance is a ratio of total new investments to average total assets<sup>1</sup> of 0.75 percent. The annual goal for achieving outstanding performance is 1 percent. For 2016, the goals were increased to 0.80 percent and 1.6 percent, respectively, and represented a 6.7 percent increase for the satisfactory goal and a 60 percent increase for the outstanding goal. Table 4 below summarizes the investment and grant totals and compares actual performance to the performance goals established for total new investments.

<sup>1</sup> Average assets are based on the methodology described in the bank's CRA Strategic Plans and calculated by averaging the total assets of the fourth quarter of the previous calendar year and the first, second, and third quarters of the current year.

	Bank Esta	ablished Goals	Bank Performance at Year-End of Plan Year (000s)			
Plan Year			New Investment Balance at Year- End (000s)	Average Assets (000s)	Actual Performance	Bank Performance Met or Exceeded
2014	0.75%	1.0%	\$5,340	\$378,487	1.41%	Exceeded Outstanding
2015	0.75%	1.0%	\$5,306	\$448,041	1.18%	Exceeded Outstanding
2016	0.80%	1.6%	\$7,304	\$393,966	1.85%	Exceeded Outstanding

#### Table 4 – CD Investment Performance

#### **Investment Details**

CitiHousing received a capital infusion of \$5 million in both 2014 and 2015, which went to help meet affordable housing needs. In 2014, CitiHousing invested \$4.7 million equity to finance Chasing Willows Apartments. The South Dakota Housing Development Authority issued the housing tax credits and provided HOME Funds. The project created 62 units of affordable rental housing. Income limits range from 30 to 60 percent of the area median income. Six other affordable housing projects that received funds during the evaluation period helped to create an additional 237 units.

In 2016, Citi invested nearly \$5.1 million in a single investor proprietary fund, with the funds used to finance rehabilitation and development costs associated with Arbor Ridge Senior Apartments. Arbor Ridge is a 61 unit multifamily LIHTC project for LMI persons age 55 and over.

#### **Grant Details**

Citi Foundation provided grant support to organizations that are responsive to CD needs through affordable housing, economic and small business development, and financial education and literacy programs for LMI persons. During the evaluation period, Citi Foundation made 55 grants totaling \$996 thousand. Highlights include:

- \$180,000 Homeownership Success and Preservation Initiative is a financial education program offered by a local housing partnership that helps LMI families accomplish their dreams of home ownership. Topics include: personal money management, credit history, financing and the loan process, and predatory lending.
- \$140,000 Native Youth Community Enterprise Incubator Program is designed to equip Native American youth with the knowledge and skills necessary to overcome the many challenges associated with living in poverty. The program provides foundational knowledge in the areas of personal finance, secondary education, workforce development, saving and goal setting, business development, and leadership.

• \$100,000 - Home Address PLUS Program is a collaborative partnership addressing statewide rural housing development. The partnership provides homeownership education, home mortgage assistance to LMI persons, and builds local capacity.

### **CD Services**

DSNB met or exceeded the goals established for outstanding performance for all three years of the evaluation period. The CD services evaluation considers the number and hours of qualified services provided and the responsiveness to community needs. CBNA employees perform services on behalf of DSNB, which has no employees.

CBNA employees partnered with organizations that qualified under the definition of CD services by serving as board members. The bank also demonstrates its responsiveness to community needs by providing technical assistance and financial expertise to nonprofit and community development organizations. These organizations focus on financial literacy, economic development, and homeownership initiatives targeted to LMI individuals and families. Table 5 below summarizes the CD services totals and compares actual performance to the outstanding performance goals established in each of the Strategic Plans.

#### Table 5 – CD Services

Plan Year	Bank Established Goals	Bank Performance Met or Exceeded		
	Satisfactory	Outstanding		
2014			Met and Exceeded Outstanding	
	1 board position	2 board positions	2 board positions	
	2 employees provide technical assistance	4 employees provide technical assistance	5 employees provided technical assistance/capacity building	
2015			Met Outstanding	
	1 board position	2 board positions	2 board positions	
	3 employees provide technical assistance	4 employees provide technical assistance	4 employees provided technical assistance	
2016			Exceeded Outstanding	
	30 Hours	40 Hours	51 Hours	
	Serve on Board of Directors, Loan Committee, or Advisory Board	Serve on Board of Directors, Loan Committee, or Advisory Board	Served on Boards of Directors	
	90 Hours – Provide CD services such as financial literacy, home ownership initiatives, or economic development	100 Hours – Provide CD services such as financial literacy, home ownership initiatives, or economic development	163 Hours – Provided CD services	
Source: E	Bank Records and approved Strategic Plans			

Following is a portion of DSNB's partnerships with key organizations that meet community development needs:

- A senior vice president served on the board of a nonprofit affordable housing organization. The organization provides financial counseling, homebuyer education, and helps build affordable housing for LMI persons in Sioux Falls.
- A senior vice president served as Vice Chairman of a nonprofit organization that addresses community and economic development within communities in South Dakota, including Sioux Falls.
- In each year of the evaluation period, three to five employees used their technical expertise and served as advisors to the local United Way's Community Impact Division (CID). The CID recommends grant funding and evaluates program effectiveness of partner agencies that provide CD services to LMI persons in Sioux Falls. A total of 343 hours were provided and over 100 nonprofit organizations were impacted by this service.
- In each year of the evaluation period, a CCC manager provided technical expertise on four separate occasions to a community action organization that assists persons living in poverty to obtain a level of self-sufficiency. The organization serves 14 counties in South Dakota, including all four counties in the Sioux Falls MSA.

## Appendix A - Scope of Examination

January 1, 2014 to De	ecember 31, 2016	
		PRODUCTS REVIEWED
		Community Development Investments, Grants, and Services
AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
Bank affiliate subsidiary		Investments
Holding company subsidiary		Grants
Bank affiliate department		Investments, CD Services
Bank affiliate		CD Services
TYPE OF EXAMINA	TION	
TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Full-scope, Strategic Plan	N/A	
	AFFILIATE RELATIONSHIP Bank affiliate subsidiary Holding company subsidiary Bank affiliate department Bank affiliate department Bank affiliate TYPE OF EXAMINA TYPE OF EXAMINATION Full-scope,	RELATIONSHIP         Bank affiliate         subsidiary         Holding company         subsidiary         Bank affiliate         department         Bank affiliate         Bank affiliate         DTYPE OF EXAMINATION         TYPE OF         EXAMINATION         Full-scope,         N/A