



PUBLIC DISCLOSURE

April 30, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital Bank, National Association
Charter Number 23850

2275 Research Blvd., Suite 600
Rockville, Maryland 20850

Office of the Comptroller of the Currency

400 7th Street S.W. Washington, DC 20291

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

Table of Contents

Overall CRA Rating..... 2
Description of Institution..... 3
Scope of the Evaluation..... 6
Discriminatory or Other Illegal Credit Practices Review..... 7
Multistate Metropolitan Statistical Area Rating..... 8
 Washington MMSA 8
Community Development Test 15
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 **Outstanding**.

The lending test is rated: Outstanding.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on an excellent distribution of loans in low- and moderate-income geographies, an excellent distribution of lending among borrowers of different income levels and businesses of different sizes, and a loan-to-deposit (LTD) ratio that is more than reasonable.
- The Community Development (CD) Test rating is based on the bank's adequate responsiveness to community development lending, investments, and community development services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's LTD ratio is more than reasonable.

The bank's quarterly net LTD ratio averaged 85.8 percent since the previous evaluation. The ratio ranged from a quarterly low of 80.9 percent as of September 30, 2021, to a quarterly high of 94.4 percent as of December 31, 2022. The ratio is calculated on a bank-wide basis. The quarterly average net LTD ratio for a peer group of four similarly situated institutions with assets ranging from \$794.4 million to \$1.3 billion was 82.1 percent over the same period. The peer group's ratio ranged from a quarterly low of 75.1 percent to a quarterly high of 86.7 percent during that time period. The bank's average LTD ratio compares favorably to comparable institutions located in the same AA.

Lending in Assessment Area

A majority of the bank's loans are outside its AA.

The bank originated and purchased 49.6 percent of its total loans inside the bank's AAs during the evaluation period. The number of loans outside of the bank's AA is due to the bank's mortgage banking activities that results in a significant number of applications from outside of the AA. Loans made outside of the bank's AA through the loan production offices (LPOs) are consistent with the bank's business and lending strategy and the bank has adequately addressed the needs of its AA.

This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This analysis had a neutral impact on the overall geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	3,523	49.6	3,584	50.9	7,047	1,537,755	54.7	1,272,710	45.2	2,810,465
Small Business	60	96.8	2	3.2	62	154,706	98.4	2,454	1.6	157,160
Total	3,523	49.6	3,586	50.4	7,109	1,692,461	57.0	1,275,164	43.0	2,967,625

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

Description of Institution

Capital Bank, National Association (CBNA, bank, or institution) is a federally chartered interstate community bank headquartered in Rockville, Maryland. The bank is a wholly owned subsidiary of Capital Bancorp, Inc., a one-bank holding company also located in Rockville, Maryland. Capital Bancorp, Inc. is traded on the NASDAQ Global Market under the symbol CBNK. The bank does not have any operating subsidiaries or affiliates. The bank has two nationwide consumer lending brands; Capital Bank Home Loan (CBHL) and OpenSky Secured Credit Card (OpenSky). The CBHL division originates conventional, and government guaranteed residential mortgage loans for sale into the secondary market with servicing rights released. The OpenSky division provides secured credit cards to underbanked customers striving to rebuild their credit scores.

The bank's AA consists of a portion of the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (Washington MMSA). The AA, which is based on the location of the bank's offices, and contiguous communities, includes:

- Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate MSA 47900:
 - Frederick-Gaithersburg-Rockville, Metropolitan Division #23224 (Frederick MD):
 - Montgomery and Frederick Counties, Maryland (MD).
 - Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division #47894 (Washington MD):
 - Washington, District of Columbia (D.C.); Calvert, Charles, Prince George's Counties, Maryland; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, and Stafford Counties, Virginia; Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park Cities, Virginia.
- Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) #12580 (Baltimore MSA):
 - Baltimore, Anne Arundel, Carroll, Harford, Howard, and Queen Anne's Counties; and Baltimore City, Maryland.

The OCC combined all the AA geographies into a single delineated rating area for this evaluation, which will be referred to as the Washington MMSA. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies.

The bank offers a full range of deposit and loan products and services to businesses and consumers. Residential mortgage loans and loans to small businesses are the primary loan products assessed in this evaluation.

In addition to its headquarters, the bank operates four full-service banking offices, two in Maryland, one in Washington, D.C., and one in Virginia. The Maryland branches are located in Montgomery and Howard Counties in the cities of Rockville, and Columbia. One branch is located in an upper-income geography, two in middle-income geographies, and one in a moderate-income geography. There are no branches in low-income geographies within the AA. All branches, except the Reston, Virginia branch, are equipped with automatic teller machines (ATMs). In addition, one stand-alone ATM is located at Revitz House, an independent living facility for seniors located in Rockville, Maryland. During the evaluation period, the bank closed one branch that was located in an upper-income geography. The branch closure was the result of limited usage relative to the branch network. CBNA did not open any branches during the evaluation period. The bank also operates five LPOs: one in Maryland, one in Virginia, one in Washington D.C., and two located outside of the bank's AA in Rehoboth Beach, Delaware and Orlando, Florida, respectively. In 2022, the bank closed the LPO located in Maryland.

As of December 31, 2022, CBNA reported total assets of \$2.1 billion, total deposits of \$1.8 billion, tier 1 capital of \$199.8 million and net loans and leases of \$1.8 billion. The loan portfolio consisted of 79.6 percent real estate loans, 13.2 percent commercial loans, 7.2 percent individual loans, and less than one percent other loans and leases.

There are no financial or legal impediments to hinder CBNA's ability to help meet the credit needs of the communities it services. The bank received an "Outstanding" rating during its last Intermediate Small Bank (ISB) CRA evaluation dated March 1, 2021.

Product Innovation and Flexibility

CBNA utilized several innovative and/or flexible loan products that addressed the needs of low- and moderate-income borrowers, geographies, and small businesses during the evaluation period. The use of these programs contributed positively to the bank's lending performance. The following is a summary of the flexible loan products that were available during the evaluation period:

Residential Lending Programs

- Federal Home Loan Bank (FHLB) of Atlanta's Affordable Housing Program (AHP) Homeownership Set-Aside (FLHB AHP Set-Aside Program): This program offers grant funding to assist low- and moderate-income borrowers with down payment, closing costs, counseling, or rehabilitation assistance in connection with the purchase or rehabilitation of an owner-occupied home. Homebuyers must have income that is less than or equal to 80 percent of the county area median income or the state median family income for the area, adjusted for family size as published annually by the Department of Housing and Urban Development (HUD), whichever is higher.
- Baltimore CityLIFT Program: CityLIFT provides \$15,000 in down payment assistance to eligible homebuyers who are purchasing a home within the city limits of Baltimore, MD. The CityLIFT down payment assistance funds will be disbursed at closing. These funds will be in the form of a mortgage secured by the property being purchased. CityLIFT is a 0 percent interest grant and if its conditions are satisfied it will be forgiven at 20 percent each year for five years.

The grant will cease, and the prorated balance will become due, payable upon demand, if the property is sold, refinanced, transferred, foreclosed or other default occurs within the first five years. To be eligible for \$15,000 home down payment assistance grants, annual incomes must not exceed 80 percent of the local area median income in Baltimore City.

- **Community Development Block Grant (CDBG):** CDBG is a HUD program that provides down payment and closing cost assistance to low- and moderate-income homebuyers purchasing a home in Baltimore City. Homebuyers must earn a homeownership counseling certificate before making an offer. The program provides \$5,000 for first-time homebuyers with a household income at or below 80 percent of area median income.
- **Home Purchase Assistance Program (HPAP):** The HPAP program provides interest free loans and closing cost assistance to low- and moderate-income individuals and families purchasing a single family, condominium, or cooperative unit in Washington, D.C. The level of gap financing assistance is based upon household size, household income, need, and the availability of funds. The maximum amount of HPAP assistance provided to very low- and moderate-income eligible households is \$202,000. Closing cost assistance is provided separately and cannot exceed \$4,000.
- **HomeAbility through the Maryland Mortgage Program (MMP):** The purpose of the MMP is to assist first-time homebuyers with closing costs associated with purchasing a home in Maryland. The Maryland Department of Housing and Community Development offers a first mortgage loan that is accompanied by a grant to pay down payment (for conventional only) or closing costs. HomeAbility is comprised of an amortizing conventional loan (first lien) and a non-amortizing deferred loan (second lien for down payment and closing cost assistance) which together finance up to 105 percent of the purchase price. The first lien (up to 95 percent of the purchase price) will be financed at a fixed interest rate and the second lien (up to 25 percent of the purchase price, with a maximum combined loan to value of 105 percent, capped at \$45,000) will be financed at a 0 percent interest rate with payment deferred for the life of the first lien.
- **Virginia Housing (VHDA) Down Payment Assistance Grant:** This program is funded through the net earnings of Virginia Housing and is part of their commitment to strengthen homeownership opportunities for Virginia residents. The program provides eligible first-time homebuyers with funds needed for their down payment. All loans have maximum income and sales price limits and/or loan limits, which vary based on the geographic area in which the home is located. The first-time homebuyer restriction does not apply if the property is located in areas of Economic Opportunity.

Small Business Administration (SBA) Lending Programs

- **SBA 504 Loan Program:** This program provides approved small businesses with long-term, fixed-rate financing used to acquire fixed assets for expansion or modernization. The program is administered through nonprofit Certified Development Companies (CDCs). CDCs are certified and regulated by the SBA, and work with SBA and participating lenders to provide financing to small businesses, which in turn, accomplishes the goal of community economic development.
- **SBA 7a Loan Program:** This program supports small businesses that need capital to make short- and long-term investments. The program provides term loans up to \$5 million, with an SBA guaranty between 75 and 85 percent, depending on loan size. Small businesses that meet SBA size eligibility standards benefit from long-term financing, a fixed maturity, and no prepayment penalties.

See the Lending Test section in the MMSA rating area for details on usage of these programs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

CBNA was evaluated under the ISB examination procedures. The ISB procedures include a Lending Test and a CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified CD lending, investments, and services. The evaluation period is January 1, 2020, to December 31, 2022.

Based on examiner discussions with bank management and review of the bank's business strategy, CBNA's primary loan products were residential (home) mortgage loans and loans to small businesses.

The bank is a HMDA reporter; therefore, the OCC considered all home mortgage loans reported on the bank's HMDA Loan Application Registers (LARs). The HMDA data was tested and found to be reliable. The bank is not required to report small business loan data; therefore, examiners reviewed a sample of 60 business loans originated or purchased within the bank's AA. The sample is considered representative of the bank's performance during the evaluation period.

Due to updated 2020 Census data, changes to census tract income level designations became effective January 1, 2022. Examiners analyzed loan data against the applicable demographic data for each period, resulting in multiple analyses and sets of tables. Examiners evaluated home mortgage loans and small loans to businesses for the 2020-2021 analysis period using 2015 American Community Survey (ACS) demographic information and for the 2022 analysis period using 2020 Census demographic information. Examiners placed more weight on the 2020-2021 analysis period as it covered a larger portion of the overall evaluation period and included more total lending, based on both loan count and dollar volume.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating 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.

Ratings

The bank's overall rating is the MMSA rating. All the interstate branches fall within the same MMSA; therefore, the conclusions formed, and ratings assigned are based on a full-scope review of the bank's single AA. Refer to the "Scope" section under MMSA rating section for details regarding how the areas were weighted in arriving at the respective rating.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 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 AA 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 Bureau of Consumer Financial Protection, as applicable.

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

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.

Multistate Metropolitan Statistical Area Rating

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

CRA rating for the Washington MMSA: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- Excellent geographic distribution of loans in the AA.
- Excellent distribution of lending to borrowers of different income levels and businesses of different sizes in the AA.
- Extensive use of innovative and/or flexible loan programs to help meet credit needs in the AA.
- Adequate responsiveness to the credit needs through CD activities in the AA.

Description of Institution's Operations in Washington MMSA

The products and services in the MMSA are provided through CNBA's main office and four full-service branches located in Washington, D.C., Maryland (MD), and Virginia. There have been no changes to the bank's AA since the previous evaluation. Please refer to the Description of Institution section for further details regarding the composition of the AA.

According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 72 financial institutions within the bank's AA operating 1,260 full-service branches with aggregate deposits of \$298.3 billion. CBNA ranked 19th with less than one percent deposit market share. The largest competitors within the AA were Capital One N.A. with a 22.8 percent market share, Bank of America, N.A. with a 16.8 percent market share, and Truist Bank with a 12.5 percent market share.

Competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the bank's AA is intense. According to the most recent 2022 Peer Mortgage Data, 928 HMDA reporters originated or purchased \$121.3 billion in home mortgage loans within the bank's AA. CBNA ranked 18th with a market share of 0.1 percent. The top five lenders were Truist Bank, Rocket Mortgage, PennyMac Loan Services LLC, Wells Fargo Bank N.A., Navy Federal Credit Union, and United Wholesale Mortgage, who held a combined market share of 21.4 percent in the AA.

Competition is also fierce for small business lending. In 2019, 938 lenders reported 546,071 small business loans originated or purchased in the bank's AA. The top five small business loan reporters in 2019 were Wells Fargo N.A., Navy Federal Credit Union, Quicken Loans, Bank of America, N.A., and SunTrust Banks, Inc. CBNA is not required to publicly report small business lending data. As a result, the bank is not captured in the small business lending market share report.

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington MMSA (2015 ACS)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,981	10.8	21.5	34.4	31.7	1.7
Population by Geography	8,463,009	8.8	21.1	35.7	33.7	0.6
Housing Units by Geography	3,329,931	9.7	21.4	35.8	32.8	0.4
Owner-Occupied Units by Geography	1,975,002	4.1	16.8	38.5	40.5	0.1
Occupied Rental Units by Geography	1,106,096	17.3	28.8	32.0	21.1	0.8
Vacant Units by Geography	248,833	20.5	24.6	30.7	23.5	0.6
Businesses by Geography	1,039,826	5.2	18.4	36.4	39.5	0.5
Farms by Geography	18,885	2.9	16.8	41.4	38.8	0.1
Family Distribution by Income Level	2,018,129	22.0	16.8	20.1	41.2	0.0
Household Distribution by Income Level	3,081,098	23.6	16.1	18.3	42.0	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$367,348
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Median Gross Rent			\$1,435
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$106,105	Families Below Poverty Level			6.3%
<i>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.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington MMSA (Census 2020)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,133	9.5	21.8	34.4	32.2	2.1
Population by Geography	8,942,045	7.7	22.2	36.0	33.3	0.9
Housing Units by Geography	3,435,606	8.6	22.3	36.0	32.3	0.7
Owner-Occupied Units by Geography	2,068,177	3.9	17.9	38.9	39.1	0.2
Occupied Rental Units by Geography	1,138,869	15.5	29.6	32.0	21.7	1.3
Vacant Units by Geography	228,560	17.6	26.3	30.1	24.4	1.6
Businesses by Geography	1,216,339	5.1	19.8	36.7	37.5	0.8
Farms by Geography	21,212	2.9	18.6	40.9	37.3	0.3
Family Distribution by Income Level	2,082,682	21.5	16.9	20.7	40.9	0.0
Household Distribution by Income Level	3,207,046	23.5	16.1	18.8	41.7	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housing Value			\$419,980
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092	Median Gross Rent			\$1,614
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV		\$126,224	Families Below Poverty Level			5.4%
<i>Source: 2020 U.S. Census and 2022 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>						

Housing Affordability

Examiners evaluated the disparity between median family incomes and the cost of housing across the Washington MSA, Baltimore MSA, and Frederick MD. 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. 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, both low- and moderate-income borrowers would be challenged to afford a mortgage loan in the Washington MSA and Frederick Metropolitan Division during both analysis periods. In the Baltimore MSA, moderate-income borrowers could afford a mortgage loan, while low-income borrowers would be challenged to afford a mortgage loan in this AA during both analysis periods.

Additionally, there was a very limited number of owner-occupied-units available in the bank's low- and moderate-income geographies. The population within the low-income geographies was 746,198; however, there were just 80,205 owner-occupied units. The population within the moderate-income geographies was 1,782,311; however, there were only 332,019 owner-occupied units.

Employment and Economic Factors

Based on the data from the Bureau of Labor Statistics, unemployment rates experienced significant increases primarily due to the effects of the COVID-19 pandemic. In May 2020, the non-seasonally

adjusted unemployment rate rose to 9.4 percent for the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA, 8.2 percent for Baltimore-Columbia-Towson, MD, and 8.6 percent for Silver Spring-Frederick-Rockville, MD. Since then, these rates have steadily declined. By December 2022, the unemployment rates had dropped to 2.5 percent for both Baltimore-Columbia-Towson, MD, and the Washington-Arlington-Alexandria MSA, and 2.2 percent for Silver Spring-Rockville, MD, all below the national average of 3.5 percent. The state of Maryland's unemployment rate was 2.5 percent as of December 2022.

The November 2022 Moody's Analytics report indicated that the economy of Washington-Arlington-Alexandria was at a standstill. The labor market showed minimal progress in the latter half of 2022, with nonfarm payrolls struggling to reach pre-pandemic levels. An inconsistent recovery in the crucial public sector significantly dragged down the local economy. However, certain private service industries, such as health services and leisure and hospitality, exhibited stronger year-over-year job growth compared to the U.S. The forecast indicated that the MSA's economy would align with regional and national averages in the near term, driven by the private sector's resurgence and increased government sector contributions to job creation in 2023. Over the long term, the MSA was expected to keep pace with the U.S. economy, propelled by favorable demographics and its emergence as an East Coast technology hub. Moody's highlighted several strengths, including its growing reputation as an East Coast technology hub, which attracted new firms and diversified the economy. The government's commitment to expanding its high-tech workforce, to include additional funding for local universities to produce more degrees in computer science, added to the area's economic strength. Furthermore, the construction of Amazon's HQ2 progressed as scheduled, and recent moves by defense corporations Boeing and Raytheon made the MSA home to four of the top five U.S. aerospace and defense companies. Arlington offered relatively lower business and living costs compared to West Coast technology hubs.

The September 2022 Moody's Analytics report indicated that the Silver Spring-Frederick-Rockville MD economy was gradually progressing. While job growth lagged behind regional and national averages, modest gains in education, healthcare, leisure and hospitality, and administrative services offset losses in finance and construction. Labor force participation, though below pre-pandemic levels, was gradually increasing, exerting some upward pressure on the unemployment rate. The housing market cooled, with single-family house prices recently declining for the first time since early 2020. Moody's identified several strengths, including an above-average population growth that supported outperformance compared to the U.S. and the Northeast over the short run. With one of the highest population growth rates in the region, the division maintained solid demand for housing, healthcare, and other consumer-facing services. Persistent weaknesses included reliance on government spending and a high cost of living. Over the long term, growth in biotechnology and proximity to Washington, DC, were expected to align with U.S. trends and surpass regional peers.

The September 2022 Moody's Analytics report indicated that the Baltimore-Columbia-Towson MSA made steady progress. Job recovery outpaced that of Maryland and the Northeast, with leisure and hospitality leading gains while most private services provided support. Although housing price appreciation slowed, it remained less pronounced than in many other metropolitan areas. Moody's predicted a return to pre-pandemic levels for the MSA in 2023, with consumer services spearheading the final stages. However, labor shortages were expected to pose a challenge. Over the long term, sluggish population gains might constrain job growth, but incomes were forecasted to fare comparatively better. Moody's highlighted several strengths of the local economy, such as being a hub for the growing cybersecurity sector, hosting established and well-funded medical research centers, and having robust transportation and distribution industries. The MSA faced weaknesses, including limited public transportation links with Washington, DC, and below-average population growth.

Community Contacts

The OCC reviewed eight community contacts completed during the evaluation period with organizations located throughout the AA. The community contacts were organizations focused on areas such as affordable housing, small businesses, economic development, and advocacy for low- and moderate-income individuals and communities. The overall perception of community involvement from financial institutions in the AA was positive. The contacts highlighted several community development needs within the AA; however, the most prevalent were affordable housing for low- and moderate-income families and access to capital for small and minority businesses. Several contacts also discussed the need for financial literacy and workforce development programs in the AA. Additionally, the COVID-19 pandemic created a need to lend to small businesses to help maintain operations during a period of cash flow disruptions.

Scope of Evaluation in Washington MMSA

The OCC conducted a full-scope review of the Washington MMSA. There are no limited-scope areas to review. All the AA geographies are combined, analyzed, and presented as one AA for purposes of this evaluation. Based on the bank's strategic plan, and discussions with management, the OCC determined that during the evaluation period, the bank's primary areas of lending focus were home mortgage and business loans.

Refer to the table in appendix A for a complete description of 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 Outstanding.

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the MMSA.

Home Mortgage Loans

Refer to Table O in the "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 geographic distribution of home loans was excellent.

2020-2021

The percentage of home mortgage loans originated in low-income geographies significantly exceeded both the percentage of owner-occupied housing units and the aggregate distribution of home mortgage loans.

The percentage of home mortgage loans in moderate-income geographies was below the percentage of owner-occupied homes in those geographies but approximated the aggregate distribution of home mortgage loans.

2022

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

Small Loans to Businesses

Refer to Table Q in the "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.

2020-2021

The percentage of small loans to businesses in low-income geographies was below the percentage of businesses in those geographies and equaled the aggregate distribution of small loans to businesses.

The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate distribution of small loans to businesses.

2022

The bank did not originate any small business loans in the low-income geographies.

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

Lending Gap Analysis

Examiners analyzed geographic lending patterns of home mortgage loans and small loans to businesses by reviewing maps of loan originations and purchases throughout the MMSA. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank.

Home Mortgage Loans

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

2020-2021

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

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

2022

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

Small Loans to Businesses

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

2020-2021

The percentage of small loans to businesses with revenues of \$1 million or less was below both the percentage of businesses with gross annual revenues of \$1 million or less and the aggregate distribution of small loans to businesses.

2022

The percentage of small loans to businesses with revenues of \$1 million or less was below the percentage of businesses with gross annual revenues of \$1 million or less but approximated the aggregate distribution of small loans to businesses.

Innovative and/or Flexible Lending Products

CBNA utilized several innovative and/or flexible loan products that addressed the needs of low- and moderate-income borrowers, geographies, and small businesses during the evaluation period. As shown in the table below, a total of 179 loans and grants in the amount of \$318.3 million were funded under the following innovative and/or flexible programs. The use of these programs contributed positively to the bank’s lending performance. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

CBNA Flexible Lending Programs		
January 1, 2020 through December 31, 2022		
Loan Program	Number of Grants	Dollar Amount (\$000s)
<i>Residential Lending Programs</i>		
Home Purchase Assistance Program (HPAP)	217	13,082
Baltimore CityLIFT Program	9	150
FLHBA AHP Set-Aside Program	80	643
Community Development Block Grant (CDBG) Program	4	33
Maryland Mortgage Program (MPP)	98	1,179
VHDA Down Payment Assistance Grant Program	6	304
Total Grants	414	15,391
<i>Small Business Administration (SBA) Lending Programs</i>		
SBA 504 Loan Program	36	78,100
SBA 7a Loan Program	71	41,345
Small Business Plus! Program	72	198,861
Total SBA Loans	179	318,306

Responses to Complaints

The OCC reviewed summary reports and maps and analyzed the bank's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the Washington MMSA is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Washington MMSA	998	99.5	136,948	85.0
Statewide/Regional	5	0.5	23,970	15.0
Total	1,003	100	160,918	100

During the evaluation period, the bank originated 1,003 CD loans totaling approximately \$160.9 million. The vast majority of the CD loans were PPP loans that revitalized or stabilized low- and moderate-income areas by retaining businesses and jobs during the COVID-19 pandemic. PPP lending contributed to the retention of approximately 13,956 jobs. The PPP loans were considered responsive to the needs of small businesses during the COVID-19 pandemic.

Examples of CD loans originated during the review period include:

- The bank refinanced a \$8.7 million loan for the renovation of a 57-unit subsidized apartment building located in a low-income geography.
- The bank refinanced a \$12 million loan for seven apartment buildings, comprising 73 units leased through the Washington DC Housing Voucher Choice Program.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington MMSA	0	0	5	36	5	100	36	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 Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, the bank did not allocate funds to qualified investments. However, it made five charitable contributions totaling \$36,000 to organizations that support community services for low and moderate-income individuals. There were no prior investments to consider.

Extent to Which the Bank Provides Community Development Services

During the review period, bank employees provided approximately 72 service hours to seven different qualifying organizations during the evaluation period. The organizations supported community services for low-and moderate-income individuals and affordable housing in the AA.

Examples of qualifying activities include the following:

- A vice president served as a board member for a nonprofit organization devoted to providing basic services including housing, healthcare, homecare, education, and emergency assistance for the most vulnerable of Montgomery County residents.
- A bank manager conducted training sessions on regional downpayment assistance programs for first-time low-and moderate-income homebuyers.

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 MSA(s) and non-MSA(s) 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:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (Washington CSA)	Full-Scope	<p>Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate MSA 47900:</p> <p>Frederick-Gaithersburg-Rockville, Metropolitan Division #23224:</p> <p>Montgomery and Frederick Counties, Maryland (MD).</p> <p>Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division #47894:</p> <p>Washington, District of Columbia (D.C.); Calvert, Charles, Prince George’s Counties, Maryland; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, and Stafford Counties, Virginia; Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park Cities, Virginia.</p> <p>Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) #12580:</p> <p>Baltimore, Anne Arundel, Carroll, Harford, Howard, and Queen Anne’s Counties; and Baltimore City, Maryland.</p>

Appendix B: Summary of MMSA and State Ratings

RATINGS Capital Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Capital Bank, National Association	Outstanding	Satisfactory	Outstanding
MMSA	Outstanding	Satisfactory	Outstanding

(*) The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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 are treated 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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
CBNA CSA (2015 ACS)	3,072	1,329,159,068	100.0	625,965	4.1	10.8	3.4	16.8	13.9	14.7	38.5	32.1	38.9	40.5	42.9	42.9	0.1	0.3	0.1
Total	3,072	1,329,159,068	100.0	625,965	4.1	10.8	3.4	16.8	13.9	14.7	38.5	32.1	38.9	40.5	42.9	42.9	0.1	0.3	0.1

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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
CBNA CSA (Census 2020)	391	208,595,799	100.0	284,007	3.9	19.2	4.2	17.9	22.3	17.6	38.9	25.8	40.1	39.1	32.2	37.9	0.3	0.5	0.3
Total	391	208,595,799	100.0	284,007	3.9	19.2	4.2	17.9	22.3	17.6	38.9	25.8	40.1	39.1	32.2	37.9	0.3	0.5	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

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.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
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
CBNA CSA (2015 ACS)	3,072	1,329,159,068	100.0	625,965	22.0	8.8	7.1	16.8	18.0	17.3	20.1	20.7	20.4	41.2	35.2	32.3	0.0	17.4	22.8
Total	3,072	1,329,159,068	100.0	625,965	22.0	8.8	7.1	16.8	18.0	17.3	20.1	20.7	20.4	41.2	35.2	32.3	0.0	17.4	22.8

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
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
CBNA CSA (Census 2020)	391	208,595,799	100.0	284,007	21.5	22.3	9.2	16.9	27.1	20.6	20.7	13.8	22.0	40.9	26.6	31.2	0.0	10.2	17.0
Total	391	208,595,799	100.0	284,007	21.5	22.3	9.2	16.9	27.1	20.6	20.7	13.8	22.0	40.9	26.6	31.2	0.0	10.2	17.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%

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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
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
CBNA CSA (2015 ACS)	40	89,888	100	270,098	5.2	2.5	2.5	18.4	20.0	17.5	36.4	42.5	37.0	39.5	35.0	40.3	0.5	0.0	0.4
Total	40	89,888	100	270,098	5.2	2.5	2.5	18.4	20.0	17.5	36.4	42.5	37.0	39.5	35.0	40.3	0.5	0.0	0.4

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
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
CBNA CSA (Census 2020)	20	64,818	100	253,621	5.1	0.00	4.5	19.8	10.0	18.0	36.7	40.0	37.4	37.5	50.0	39.6	0.8	0.0	0.6
Total	20	64,818	100	253,621	5.1	0.00	4.5	19.8	10.0	18.0	36.7	40.0	37.4	37.5	50.0	39.6	0.8	0.0	0.6

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21
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	
CBNA CSA (2015 ACS)	40	89,888	100	270,098	89.4	40.0	47.4	3.6	60.0	7.0	0.0	
Total	40	89,888	100	270,098	89.4	40.0	47.4	3.6	60.0	7.0	0.0	
<i>Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022
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	
CBNA CSA (Census 2020)	20	64,818	100	253,621	90.8	50.0	52.1	3.0	50.0	6.2	0.0	
Total	20	64,818	# 100	253,621	90.8	50.0	52.1	3.0	50.0	6.2	0.0	
<i>Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>												

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.